EPA Jacket 71368-61

Vol.4

Material to be added to an e-Jacket/Jacket

Reg. No. 71368-01

Description: _____

1. ☐ Placement within the e-Jacket/jacket:
   - ☐ Default: (chronological, top = newest)
   - ☐ File Location: (PDF page number, i.e., "before page 45")

2. ☐ Send to Data Extraction contractors this material:
   - ☐ Newly stamped accepted label
   - ☐ Notification
   - ☒ New CSF
   - ☐ Other: New Alternate CSF

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Toni Daniel

Phone: 703 305-5409 Division: RDS

Date: 4/18/2012

Created August 19, 2008

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 18 2012

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Mr. Nathan P. Ehresman
Nufarm Inc.
4020 Aerial Center Pkwy, Ste 103
Morrisville, NC 27560

Subject: New Source of Imidacloprid for an Alternate Confidential Statement of Formula
Imidacloprid Technical
EPA Reg. No. 71368-61
Your Submission date: January 12, 2012

Dear Mr. Ehresman:

The Agency has reviewed your submission for an alternate Confidential Statement of Formula (CSF) using a new source of the active ingredient Imidacloprid. The csf dated January 12, 2012 is in compliance with and is substantially similar in chemical composition and physical chemical properties to the current basic csf. The proposed alternate csf is acceptable. The csf has been added to your file as alternate formulation #4. If you have any questions concerning this letter, please contact Dani Daniel at (703) 305-5409 or daniel.dani@epa.gov.

Sincerely,

for Venus Eagle, Product Manager 01
Insecticide/Rodenticide Branch
Registration Division 7504P

EPA

United States
Environmental Protection Agency
Washington, DC 20460

☐ **Registration**
☒ **Amendment**
☐ **Other:**

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
71368-61	**Venus Eagle**	☒ None ☐ Restricted
4. Company/Product (Name) **Nufarm Inc./ Imidacloprid Technical**	PM# **01**	

5. Name and Address of Applicant *(Include ZIP Code)*
Nufarm Inc
C/O Nufarm Americas Inc- Agent for Nufarm Inc
4020 Aerial Center PKWY, STE 103
Morrisville, NC 27560

☐ *Check if this is a new address*

6. **Expedited Review.** In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to:
EPA Reg. No. _____
Product Name: _____

Section – II

☒ Amendment – Explain below.
☐ Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.
☐ Final printed labels in response to Agency letter dated _____
☐ "Me Too" Application
☐ Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Application for Pesticide: Amendment- new source of active ingredient

PRIA CATEGORY: R340 ; Amendment requiring data review within RD (source change to an unregistered source of active ingredient)
Pay.gov Tracking ID: 255IA2AF
Agency Tracking ID: 74275162448

Section – III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes* ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Metal ☒ Plastic ☐ Glass ☐ Paper ☐ Other (Specify)
**Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt. / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
☒ Label ☐ Container	25, 50 Kg	☒ On Label ☐ On labeling accompanying product

6. Manner in Which Label is Affixed to Product ☐ Lithograph ☒ Paper glued ☐ Stenciled ☐ Other _____

Section – IV

1. Contact Point *(Complete items directly below for identification of individuat to be contacted, if necessary, to process this application)*

Name	Title	Telephone No. (Include Area Code)
Nathan P. Ehresman	**Director, Regulatory Affairs**	**919-379-2515**

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received **(Stamped)**

2. Signature	3. Title	
	Director, Regulatory Affairs	
4. Typed Name **Nathan P. Ehresman**	4. Date **January 24, 2012**	

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete White- EPA File Copy (original) Yellow- Applicant Copy

48728000

NUFARM INC.
4020 Aerial Center Parkway, Suite 103
Morrisville, NC 27560
Phone: 919-379-2515

January 24, 2012

Venus Eagle (PM-01)
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

Subject: **Nufarm Inc.; Imidacloprid Technical (EPA Reg. No. 71368-61)**
Non-Fast Track Amendment to Existing Registration- PRIA R340
New source of Active Ingredient

Dear Ms. Eagle:

Nufarm Limited is submitting an application to register a new source of imidacloprid active ingredient for Imidacloprid Technical (71368-61). The new source is identified by laboratory code (NUP-11010). The new source of imidacloprid (NUP-11010) is identical or substantially similar in composition to the existing source(s).

Nufarm has determined that this action falls under PRIA Category R340. We have pre-paid the service fee for this action and provide the following records of payment:

Pay.gov Tracking ID: 255IA2AF
Agency Tracking ID: 74275162448

In support of this action, please find enclosed:

- Application for Pesticide Registration (8570-1)
- Certification with Respect to Citation of Data (8570-34)
- Data Matrix- Agency Internal & Public Use Copies (8570-35)
- Proposed Confidential Statement of Formula (8570-4)- Alternate #4. 3 copies dated (January 24, 2012)
- Study Volumes 2, 3, and 4, (Product Chemistry)

Please contact me at 919-379-2515 (or nathan.ehresman@us.nufarm.com) if you have any questions regarding this action.

Kind regards,

Nathan P. Ehresman
Director, Regulatory Affairs
Nufarm Americas Inc.

Subdivision D: Product Chemistry

Vol. No.	OPPTS No.	EPA GLN	Study References	MRID No.
1	N/A	N/A	**Administrative Documents**	
2	830.1550 830.1600 830.1620 830.1670 830.1700 830.1750 830. t800	61-1 61-2 61-2 61-3 62-1 62-2 62-3	Cooke, A. **Technical Imidacloprid, NUP-11010 Product Identity and Process.** January 23, 2012. Study Number RTP- t2-0004-REG. 127 pages.	**48728001**
3	830.1700	62-1	Sardinha, R. **Qualitative and Quantitative Profile of the Test Substance Imidacloprid Technical NUP-11010 (Five Batch Analysis)** February 2 20t t. Study Number: 1923.030.563.10. 90 pages.	**48728002**
4	830.6302 830.6303 830.6304 830.6313 830.6314 830.6315 830.6316 830.6317 830.6320 830.7000 830.7050 830.7200 830.7300 830.7370 830.7550 830.7840 830.7950	63-2 63-3 63-4 63-13 63-14 63-15 63- t6 63-17 63-20 63-12 — 63-5 63-7 63-10 63-11 63-8 63-9	Ehresman, N. **Imidacloprid Technical (NUP-11010): Physical & Chemical Properties** January 23, 2012. Study Number RTP-12-004-TR. 10 pages.	**48728003**

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WASHINGTON, D.C. 20460

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DATA MATRIX

Date: January 24, 2012	**EPA Reg. No./File Symbol:** 71368-61	Page 1 of 8
Nufarm Inc. 4020 Aerial Center Parkway, Suite 103 Morrisville, NC 27560	**Product:** Imidacloprid Technical (NUP-11010)	
Ingredient: Imidacloprid (PC Code 129099)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS Series 830	**Product Properties**				
830.1550	Product identity and composition	Volume 2	Nufarm Inc. (071368)	Own	
830.1600	Description of materials used to produce the product	Volume 2	Nufarm Inc. (071368)	Own	
830.1620	Description of production process	Volume 2	Nufarm Inc. (071368)	Own	
830.1650	Description of formulation process	--	--	N/A	1
830.1670	Discussion of formation of impurities	Volume 2	Nufarm Inc. (071368)	Own	
830.1700	Preliminary analysis	Volume 3	Nufarm Inc. (071368)	Own	
830.1750	Certified limits	Volume 2	Nufarm Inc. (071368)	Own	
830.1800	Enforcement analytical method	Volume 2	Nufarm Inc. (071368)	Own	
830.1900	Submittal of samples	--	--	N/A	2
830.6302	Color	Volume 4	Nufarm Inc. (071368)	Own	
830.6303	Physical state	Volume 4	Nufarm Inc. (071368)	Own	
830.6304	Odor	Volume 4	Nufarm Inc. (071368)	Own	
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	Volume 4	Nufarm Inc. (071368)	Own	
830.6314	Oxidation/reduction: chemical incompatibility	Volume 4	Nufarm Inc. (071368)	Own	

Signature	Name and Title	Date
	Nathan P. Ehresman / Director, Regulatory Affairs	January 24, 2012

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DATA MATRIX

Date: January 24, 2012	**EPA Reg. No./File Symbol:** 71368-61	Page 2 of 3
Nufarm Inc. 4020 Aerial Center Parkway, Suite 103 Morrisville, NC 27560	**Product:** Imidacloprid Technical (NUP-11010)	
Ingredient: Imidacloprid (PC Code 129099)		

830.6315	Flammability	Volume 4	Nufarm Inc (071368)	Own	
830.6316	Explodability	Volume 4	Nufarm Inc (071368)	Own	
830.6317	Storage stability	Volume 4	Nufarm Inc (071368)	Own	
830.6319	Miscibility	--	--	N/A	3
830.6320	Corrosion characteristics	Volume 4	Nufarm Inc (071368)	Own	
830.6321	Dielectric breakdown voltage	--	--	N/A	4
830.7000	pH	Volume 4	Nufarm Inc. (071368)	Own	
830.7050	UV/Visible absorption	Volume 4	Nufarm Inc. (071368)	Own	
830.7100	Viscosity	--	--	N/A	5
830.7200	Melting point/melting range	Volume 4	Nufarm Inc. (071368)	Own	
830.7220	Boiling point/boiling range	--	--	N/A	6
830.7300	Density/relative density/bulk density	Volume 4	Nufarm Inc. (071368)	Own	
830.7370	Dissociation constants in water	Volume 4	Nufarm Inc. (071368)	Own	
830.7520	Particle size, fiber length, and diameter distribution	--	--	N/A	7
830.7550	Partition coefficient (n-octanol/water), shake flask method	Volume 4	Nufarm Inc. (071368)	Own	
830.7840	Water solubility: shake flask method	Volume 4	Nufarm Inc. (071368)	Own	

Signature	Name and Title	Date
	Nathan P. Ehresman / Director, Regulatory Affairs	January 24, 2012

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DATA MATRIX

Date: January 24, 2012	**EPA Reg. No./File Symbol:** 7t368-61	Page 3 of 3
Nufarm Inc. 4020 Aerial Center Parkway, Suite 103 Morrisville, NC 27560	**Product:** Imidacloprid Technical (NUP-11010)	
Ingredient: Imidacloprid (PC Code 129099)		

830.7950	Vapor pressure	Volume 4	Nufarm Inc (071368)	Own	

Footnotes:

1 Description of Formulation Process (OPPTS 830.1620) data are not required as **Imidacloprid Technical** consists solely of technical grade active ingredient (40 CFR § 158.335) and is not a formulated product.
2 Submittal of Samples (OPPTS 830.1900) data are not required as **Imidacloprid Technical** is not a new active ingredient (40 CFR § 158.310(e))
3 Miscibility (OPPTS 830.6319) data are not required as **Imidacloprid Technical** is not an emulsifiable liquid (40 CFR § 158.310(e))
4 Dielectric Breakdown Voltage (OPPTS 830.6321) data are not required as **Imidacloprid Technical** is a TGAI (40 CFR § 158.310(e))
5 Viscosity (OPPTS 830.7100) data are not required as **Imidacloprid Technical** is a liquid (40 CFR § 158.310(e))
6 Boiling Point (OPPTS 830.7220) data are not required as **Imidacloprid Technical** is not a liquid at room temperature (40 CFR § 158.310(e))
7 Particle Size (OPPTS 830.7520) data are not required as **Imidacloprid Technical** is not water insoluble or fibrous (40 CFR § 158.310(e))

Signature	Name and Title	Date
	Nathan P. Ehresman / Director, Regulatory Affairs	January 24, 2012

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DATA MATRIX

Date: January 24, 2012	**EPA Reg. No./File Symbol:** 71368-61	Page 4 of 8
Nufarm Inc. 4020 Aerial Center Parkway, Suite 103 Morrisville, NC 27560	**Product:** Imidacloprid Technical (NUP-110 t0)	
Ingredient: Imidacloprid (PC Code t29099)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS Series 870	**Health Effects**				
870.1 t00	Acute oral toxicity - rat	Cite-All	--	PAY	
870.1200	Acute dermal toxicity - rabbit	Cite-All	--	PAY	
870.1300	Acute inhalation toxicity - rat	Cite-All	--	PAY	
870.2400	Primary eye irritation - rabbit	Cite-All	--	PAY	
870.2500	Primary dermal irritation -rabbit	Cite-All	--	PAY	
870.2600	Dermal sensitization - Guinea pig	Cite-All	--	PAY	

Signature	Name and Title	Date
	Nathan P. Ehresman / Director, Regulatory Affairs	January 24, 2012

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DATA MATRIX

Date: January 24, 2012	**EPA Reg. No./File Symbol:** 71368-61	Page 5 of 8
Nufarm Inc. 4020 Aerial Center Parkway, Suite 103 Morrisville, NC 27560	**Product:** Imidacloprid Technical (NUP-11010)	

Ingredient: Imidacloprid (PC Code 129099)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter (EPA CO#)	Status	Note
Imidacloprid (PC 129099) Generic Data Requirements					
Imidacloprid Generic Data Requirements	Cite-All		Syngenta Crop Protection, Inc. (000100)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Bayer CropScience LP (000264)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		FMC Corp. Agricultural Products Group (000279)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Chemtura Corporation (000400)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Bayer Environmental Sciences (000432)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		The Scotts Company (000538)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		PBI/Gordon Corporation (002217)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Bayer Corporation (003125)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Helena Chemical Company (005905)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Gustafson LLC (007501)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		J. J. Mauget Company (007946)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		The Andersons Lawn Fertilizer Division (009198)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Chemical Specialties Inc. (010356)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Bayer Healthcare LLC (011556)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Mitsui Chemicals, Inc. (033657)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Loveland Products, Inc. (034704)	PAY	

Signature	Name and Title	Date
	Nathan P. Ehresman / Director, Regulatory Affairs	January 24, 2012

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DATA MATRIX

Date: January 24, 2012	EPA Reg. No./File Symbol: 71368-61	Page 6 of 8
Nufarm Inc. 4020 Aerial Center Parkway, Suite 103 Morrisville, NC 27560	Product: Imidacloprid Technical (NUP-11010)	

Ingredient: Imidacloprid (PC Code 129099)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter (EPA CO#)	Status	Note
Imidacloprid (PC 129099) Generic Data Requirements					
Imidacloprid Generic Data Requirements	Cite-All		Lanxess Corporation (039967)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Spray Drift Task Force (066607)	OWN	Footnote 1
Imidacloprid Generic Data Requirements	Cite-All		Albaugh Inc. (042750)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Aeroxon Inc. (043419)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Control Solutions (053883)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Outdoor Residential Exposure Task Force, LLC (071754)	OWN	Footnote 1
Imidacloprid Generic Data Requirements	Cite-All		Agricultural Reentry Task Force (071755)	OWN	Footnote 1
Imidacloprid Generic Data Requirements	Cite-All		Makhteshim-Agan of North America, Inc. (066222)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		FIFRA Endangered Species Task Force, LLC (073989)	OWN	Footnote 1
Imidacloprid Generic Data Requirements	Cite-All		Cheminova, Inc. (067760)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Residential Exposure Joint Venture (REJV) (074888)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Agricultural Handlers Exposure Task Force (075234)	OWN	Footnote 1
Imidacloprid Generic Data Requirements	Cite-All		Mycogen Seeds (068467)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Arbor Systems, Inc. (069117)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Pet Logic, LLC (069332)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Repar Corp (069361)	PAY	

Signature	Name and Title	Date
	Nathan P. Ehresman / Director, Regulatory Affairs	January 24, 2012

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DATA MATRIX

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Nufarm Inc. 4020 Aerial Center Parkway, Suite 103 Morrisville, NC 27560	**Product:** Imidacloprid Technical (NUP-11010)	
Ingredient: Imidacloprid (PC Code 129099)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter (EPA CO#)	Status	Note
Imidacloprid (PC 129099) Generic Data Requirements					
Imidacloprid Generic Data Requirements	Cite-All		United Phosphorus, Inc. (069811)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Nufarm, Inc. (071368)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Bayer Advanced (072155)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Scimetrics, Ltd. Corp. (072500)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Zelam Ltd. (072616)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Rockwell Laboratories, Ltd. (073079)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Sapstain Industry Group (SIG) (073154)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Univar USA Inc. (073748)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Innovative Pest Control Products (073766)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Arborjet (074578)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Arch Treatment Technologies, Inc. (075506)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Gro-Pro, LLC (079676)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Rotam Ltd. (081598)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Etigra LLC (081959)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Ensystex III, Inc. (082957)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Rotam Agrochemical Company Limited (083100)	PAY	

Signature	Name and Title	Date
	Nathan P. Ehresman / Director, Regulatory Affairs	January 24, 2012

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DATA MATRIX

Date: January 24, 2012	**EPA Reg. No./File Symbol:** 71368-61	Page 8 of 8
Nufarm Inc. 4020 Aerial Center Parkway, Suite 103 Morrisville, NC 27560	**Product:** Imidacloprid Technical (NUP-11010)	
Ingredient: Imidacloprid (PC Code 129099)		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter (EPA CO#)	Status	Note
Imidacloprid (PC 129099) Generic Data Requirements					
Imidacloprid Generic Data Requirements	Cite-All		Sharda USA LLC (083529)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Celsius Property B.V., Amsterdam (NL) (083558)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Amtide, LLC (83851)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Ensystex IV, Inc. (083923)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Dalian Chemphy Chemicals Co., Ltd. (073467)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Generic Endangered Species Task Force (GESTF) (084653)	OWN	Footnote 1

FOOTNOTES

1. Nufarm Americas, Inc. is a member of this task force.

Signature	Name and Title	Date
	Nathan P. Ehresman / Director, Regulatory Affairs	January 24, 2012

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address and Telephone Number	EPA Registration Number/ File Symbol
Nufarm Inc., c/o Nufarm Americas Inc Agent for Nufarm Inc. 4020 Aerial Center PKWY, Suite 103, Morrisville, NC 27560	**71368-61**
Active Ingredient(s) and/or representative test compound(s): **Imidacloprid (PC Code t29099)**	Date **January 24, 2012**
General use pattern(s) (list all those claimed for this product using 40 CFR Part 158) **Terrestrial food crop, Terrestrial feed crop, Greenhouse food crop, Indoor food, Terrestrial nonfood crop, Greenhouse nonfood crop, Residential outdoor, Indoor nonfood, Forestry**	Product Name **Imidacloprid Technical**

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data Call-In Notice is supported by all data submitted or cited in the application for registration, the form for reregistration, or this Data Call-In response. In addition, if cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (t) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that t am the original submitter or that I have obtained the written permission of the original submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exctusive use study, either: (a) t am the original data submitter; (b) I have obtained the written permission of the original data submitter to use this study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(t)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Signature	Date	Typed or Printed Name and Title
	January 24, 2012	Nathan P. Ehresman / Director, Regulatory Affairs

EPA Form 8570-34 (9-97) Electronic and Paper versions available. Submit only Paper version.

PRIA 2 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

3/23/09

21 Day Screen Start Date: 1-26-12

Experts In-Processing Signature: MF Harrington Date 1-27-12 Fee Paid: Yes __

Division management contacted on issues No_____Yes _____Date _____

EPA Reg. Number: 71368-61	EPA Receipt Date: 1-26-12

	Items for Review			Yes	No	N/A*
1	**Application Form** (EPA Form 8570-1)(link to form) signed & complete including package type			X		
2	**Confidential Statement of Formula** all boxes completed, form signed, and dated (EPA Form 8570-4) (Link to form)			X		
	a) All inerts (link to http://www.epa.gov/opprd001/inerts/), including fragrances, approved for the proposed uses (see Footnote A) Technical impurities only - no inerts to review	**yes** X	**no**			
3	**Certification with Respect to Citation of Data** (EPA Form 8570-34) (Link to form) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	**yes**	**no**			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	**Formulator's Exemption Statement** (EPA Form 8570-27) (Link to form) completed and signed (N/A if source is unregistered or applicant owns the technical)					X
5	**Data Matrix** (EPA Form 8570-35) (Link to form) both internal and external copies (PR 98-5) (Link to PR 98-5) completed and signed (N/A if 100% repack)			X		
	a) Selective Method (Fee category experts use)	**yes** X	**no**			
	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	**5 Copies of Label (link to http://www.epa.gov/oppfead1/labeling/lrm/) (Electronic labels on CD are encouraged and guidance is available)(link to** http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels)				X	

7	**Is the data package consistent with PR Notice 86-5** (link to PRN 86-5)	X		
8	**Notice of Filing (link to http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm) included with petitions (link to http://www.epa.gov/pesticides/regulating/tolerances.htm)**			X
9	**If applicable for conventional applications, reduced risk rationale (link to http://www.epa.gov/opprd001/workplan/reducedrisk.html)**			X
10	**Required Data (link to http://www.epa.gov/pesticides/regulating/data_requirements.htm) and/or data waivers. See Footnote C.**			X
	a) List study (or studies) not included with application			

Comments:

TECHNICAL & IMPURITIES ONLY - NO INERT REVIEW. AA 2/2/12 /cm

MRID 487280 - DATA PASSED 86-5 REVIEW. AA 2/2/12

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses. If an unapproved inert is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. <u>All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.</u>

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses **even if a product is currently registered** by consulting the inert Web

site [link to http://www.epa.gov/opprd001/inerts/lists.html] and if the inert is not approved, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient.** Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch [Link to http://www.epa.gov/oppbppd1/biopesticides/contacts_bppd.htm].

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information [link to http://www.epa.gov/opprd001/inerts/tips.pdf] must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or

2. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R311, R312 or R313), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or

2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or

2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

Material Sent for Data Extraction

Reg. # 71368-61

Description: _____

☐ Material(s) Sent to Data Extraction Contractors:

- ☐ New Stamped Label Dated _____
- ☐ Notification Dated _____
- ☒ New CSF(s) Dated 6/28/2011
- ☐ Other: _____

☐ Decision #: _____

☐ Other Action/Comments: _____

_____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Dani Daniel

Phone: 703 305-5409 Division: RD

Date: 11/21/2011

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

NOV 2 1 2011

Mr. Nathan P. Ehresman
Nufarm Inc.
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527

Subject: New Source for Active Ingredient of an Existing Technical
Imidacloprid Technical
EPA Registration 71368-61
Date Submitted: June 28, 2011

Dear Mr. Ehresman:

The Agency has received and reviewed your submission request for a new source of active ingredient for the existing registration of Imidacloprid Technical. The Agency accepts the alternate Confidential Statement of Formula (CSF) for alternate 3. This CSF is now a part of the product jacket. If there are questions contact Dani Daniel at 703 305-5409 or electronically at daniel.dani@epa.gov.

Sincerely,

Venus Eagle
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division 7504P)

Please read instructions on reverse before completing form. Form Approved, OMB No. 2070-0060, Approval expires 05-31-98

EPA

United States
Environmental Protection Agency
Washington, DC 20460

☐ **Registration**
☒ **Amendment**
☐ **Other:**

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
71368-61	**Venus Eagle**	☒ None ☐ Restricted
4. Company/Product (Name) **Nufarm Inc./ Imidacloprid Technical**	PM# **01**	
5. Name and Address of Applicant *(Include ZIP Code)* **Nufarm Inc 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527** ☐ *Check if this is a new address*	6. **Expedited Review.** In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name: _____	

Section – II

☒ Amendment – Explain below.
☐ Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.
☐ Final printed labels in response to Agency letter dated _____
☐ "Me Too" Application
☐ Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Application for Pesticide: Amendment- new source of active ingredient

PRIA CATEGORY: R340 ; Amendment requiring data review within RD (source change to an unregistered source of active ingredient)

Pay.gov Tracking ID: 253PBJUS
Agency Tracking ID: 74215444450

Section – III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes* ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Metal ☒ Plastic ☐ Glass ☐ Paper ☐ Other (Specify)
***Certification must be submitted**	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt. / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
☒ Label ☐ Container	25, 50 Kg	☒ On Label ☐ On labeling accompanying product

6. Manner in Which Label is Affixed to Product ☐ Lithograph ☒ Paper glued ☐ Stenciled ☐ Other _____

Section – IV

7. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application)*

Name	Title	Telephone No. (Include Area Code)
Nathan P. Ehresman	**Director, Regulatory Affairs**	**919-655-0018**

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature	3. Title	6. Date Application Received **(Stamped)**
	Director, Regulatory Affairs	
4. Typed Name **Nathan P. Ehresman**	4. Date **June 28, 2011**	

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete — White- EPA File Copy (original) Yellow- Applicant Copy

DATE OUT: **14 / NOVEMBER / 2011**

SUBJECT: **PRODUCT CHEMISTRY REVIEW OF MP [X] EP [ ]**
DP BARCODE No.: DP391956 **EPA Reg. No.:** 71368-61
PRODUCT NAME: Imidacloprid Technical
COMPANY: Nufarm Inc.
FOOD USE [X] INTEGRATED FORMULATION [X]
PCC: 129099 **Decision No.** 451494
ACTION CODE: R340

FROM: Hari Mukhoty, DVM, PhD
Product Chemistry Team
Technical Review Branch / RD (7505P)

11/18/11

TO: Dani Daniel / Venus Eagle, RM 01
Insecticide-Rodenticide Branch / RD (7505P)

INTRODUCTION:

The Registrant has submitted an amended CSF (dated: 06/28/2011) as alternate formulation (Alt. # 3) to the currently registered basic TGAI/MUP under EPA Reg. No. 71368-61. The product chemistry data for the basic CSF (dated 11/30/2005 & 08/04/2006) were reviewed and were found to be acceptable. The applicant has also submitted an approved label accepted on 04/20/2006 for the aforesaid basic. The product chemistry data for the alt. formulation # 3 have been submitted under MRIDs: 485282-01 through -04.

The primary review of the product chemistry data was performed by a contractor, Summitec Corporation, Tennessee (DER document is attached at the last page of this review) and TRB is conducting the secondary review.

The aforesaid alternate formulation # 3 is manufactured by Jiangsu Fengshan Group Co. Ltd in P.R. China for Nufarm Inc. IL, USA.

The registrant in their accepted label text clearly indicates that this proposed MUP is intended to be formulated into end-use products with food and non-food uses.

TRB has been requested to evaluate the product chemistry data required for the registration of the proposed Alt. # 3 MUP.

SUMMARY OF FINDINGS:

1. The proposed TGAI/MUP contains the active ingredient: Imidacloprid (98.00%).

2. The overall mean of the active ingredient from the five batch analysis is 98.64% [MRID: 485282-02, Page 58].

3. The proposed nominal concentration of the active ingredient in the MUP is 98.00%. The nominal concentration of the active ingredient matches with the label claim. This is in compliance with PR Notice 91-2. The registrant certifies that certified limits of the active ingredient and the associated impurities are standard and therefore comply with 40 CFR § 158.175 (b) (2).

4. The CSF of the proposed TGAI/MUP is filled out completely and correctly. This CSF has been reviewed by I.I.A. Branch on 05/18/2011 and they have concluded that it contains active ingredient and impurities only.

5. The product chemistry data submitted for Group A corresponding to guidelines 830.1550 (product identity and composition), 830.1600 (description of materials used to produce the product), 830.1620 (description of production process), 830.1670 (discussion of formation of impurities), 830.1750 (certified limits) satisfy the product chemistry data requirements of 40 CFR §158.320, 158.325, 158.330, 158.340, and 158.350 respectively for the proposed formulation [MRID(s): 485282-01].

6. The active ingredient and associated impurities were quantified by HPLC-DAD-MS. The wave length used for DAD was 270 nm. NMR spectrum was also used to identify the structure of Imidacloprid [MRIDs: 485282-02].

Similar analytical techniques can also be applied for Enforcement Analytical Method]MRID: 485282-01, page 9 of 11].

7. Product chemistry Group A and Group B data, with the exception of the exception of Corrosion characteristics (830.6320) are satisfied and acceptable]MRIDs: 485282-03 and -04].

8. The registrant did not comment regarding the toxicological significance of the associated impurities present in the proposed TGAI/MUP.

CONCLUSIONS:

1. TRB has reviewed the CSF for the proposed TGAI/MUP (CSF for alt. # 3, dated: 06/20/2011) and has found it to be acceptable.

2. Product chemistry Group A and Group B data are satisfied and acceptable.

3. The proposed label was screened as it pertains to the product chemistry requirements. The final review of the proposed label and uses are the purview of the PM team.

DP BARCODE No.: 391956 **EPA Reg. No.:** 71368-61 **PRODUCT NAME:** Imidacloprid Technical

PRODUCT CHEMISTRY DATA (SERIES 830 Group A)

Group A	Data Required Fulfilled	MRID No.
830.1550. Chemical Identity (same as in Product CSF dated 11/15/2008)	A	485282-01
830.1600. Beginning Materials	A	"
830.1620. Production process	A	"
830.1650. Formulation process	NA	
830.1670. Discussion of Impurities	A	485282-01 & -02
830.1700. Preliminary Analysis	A	485282-02
830.1750. Certified Limits	A	485282-01
830.1800. Enforcement Analytical Method	A	"

A = Acceptable NA = Not Applicable

DP BARCODE No.: 391956 **EPA Reg. No.:** 71368-61 **PRODUCT NAME:** Imidacloprid Technical

Group – B	Data Required Fulfilled	Value or Qualitat. Descrip.	MRID No.
830.6302. Color	A	White	485282-03
830.6303. Physical State	A	Solid - Powder	"
"830.6304. Odor	A	No odor	"
830.6313. Stability to normal and elevated temp, metals and metal ions	A	Stable when exposed to 54° C for two weeks. Stable to iron, aluminum, iron acetate, and aluminum acetate for 14 days @ 54° C.	"
830-6314. Oxidation/Reduction action – Chemical incompatibility	A	Did not react vehemently with iron powder, water, $NH_4H_2PO_4$, kerosene and $KMnO_4$	"
830.6315. Flammability	W	Does not contain combustible components.	485282-04
830.6316. Explodability	W	Not explosive	"
830.6317. Storage stability	W	Not required, Can use data from basic 473153-01	"
830.6319. Miscibility	NA		
830.6320. Corrosion Characteristics	W	Not required, Can use data from basic 473153-01	485282-04 473153-01
830.7200. Melting point	A	142.8 – 143.5 °C	485282-03
830.7220. Boiling point	NA		

830.7050. UV/visible light absorption	A	at pH 2.10 log = 4.12, 4.33 at pH 6.88 log = 4.12, 4.33 at pH 13.14 log = 4.28, 4.30	"
830.7100 Viscosity		NA	
830.7370. Dissociation Constant	A	pKa = 12.35 at room tempersture.	"
830.7550. Partition Coefficient	A	0.5 at room temperature	"
830.7950. Vapor Pressure	W	May use from basic MRID: 468123-01	485282-04 468123-01
830.7840. Solubility	A	@ 20°C In water = 1.0 g/L	485282-03
830.7000. pH	A	6.490	485282-03
830.7300. Density	A	1.38 g/mL	"

Explanations: A = Acceptable, NA = Not applicable, G = Data gap N/A = Not acceptable, W = Waiver granted.

CONFIDENTIAL APPENDIX

Product identity & composition (830.1550)

PRODUCT IDENTITY AND COMPOSITION (OPPTS 830.1550)

MRID 485282-01

NUP-11024 is the Nufarm laboratory code that identifies the technical grade active ingredient containing (*E*)-1-(6-chloro-3-pyridylmethyl)-*N*-nitroimidazolidin-2-ylideneamine, (Imidacloprid). NUP-11024 contains Imidacloprid and associated process impurities which are identified and quantified in the preliminary analysis of five batches study #NC-2011-002, "Preliminary Analysis of Imidacloprid TGAI". This study is submitted in a separate volume with this submission. The source of NUP-11024 is shown in the description of the manufacturing process in the confidential appendix.

Test Article: NUP-11024 – Nufarm Technical Imidacloprid

Active Ingredient Identity:

CAS No.: 138261-41-3

Common name/alias: Imidacloprid

Chemical Names:

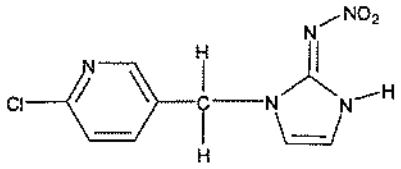
IUPAC: (*E*)-1-(6-chloro-3-pyridylmethyl)-*N*-nitroimidazolidin-2-ylideneamine

CAS: (2*E*)-1-[(6-chloro-3-pyridinyl)methyl]-*N*-nitro-2-imidazolidinimine

Molecular formula: $C_9H_{10}ClN_5O_2$

Molecular weight: 255.66

Structure:



Pages 30-58-*Manufacturing process information may be entitled to confidential treatment*

DATA EVALUATION RECORD

IMIDACLOPRID TECHNICAL

STUDY TYPES: Product Chemistry and Composition (OPPTS 830.1550)
Description of Materials Used to Produce the Product (OPPTS 830.1600)
Description of the Production Process (OPPTS 830.1620)
Discussion of Formation of Impurities (OPPTS 830.1670)
Preliminary Analysis (OPPTS 830.1700)
Certified Limits (OPPTS 830.1750))
Enforcement Analytical Method (OPPTS 830.1800)
Physical and Chemical Characteristics (OPPTS 830.6302-830.7950)

MRIDs: 485282-01; 485282-02; 485282-03; 485282-04

Prepared for
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Prepared by
Summitec Corporation
9724 Kingston Pike, Suite 602
Knoxville, Tennessee
Task Order No. 3-A-117

Primary Reviewer:
Dennis M. Opresko, Ph.D.

Signature:
Date: OCT 18 2011

Secondary Reviewer:
Eric Lewis, M.S.

Signature: Eric B. Lewis
Date: OCT 18 2011

Robert Ross, M.S., Program Manager

Signature: Robert M. Ross
Date: OCT 18 2011

Quality Assurance:
Jennifer Goldberg, B.S.

Signature: Jennifer Goldberg
Date: OCT 18 2011

Disclaimer

This review may have been altered subsequent to the contractors' signatures above.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

July 12, 2011

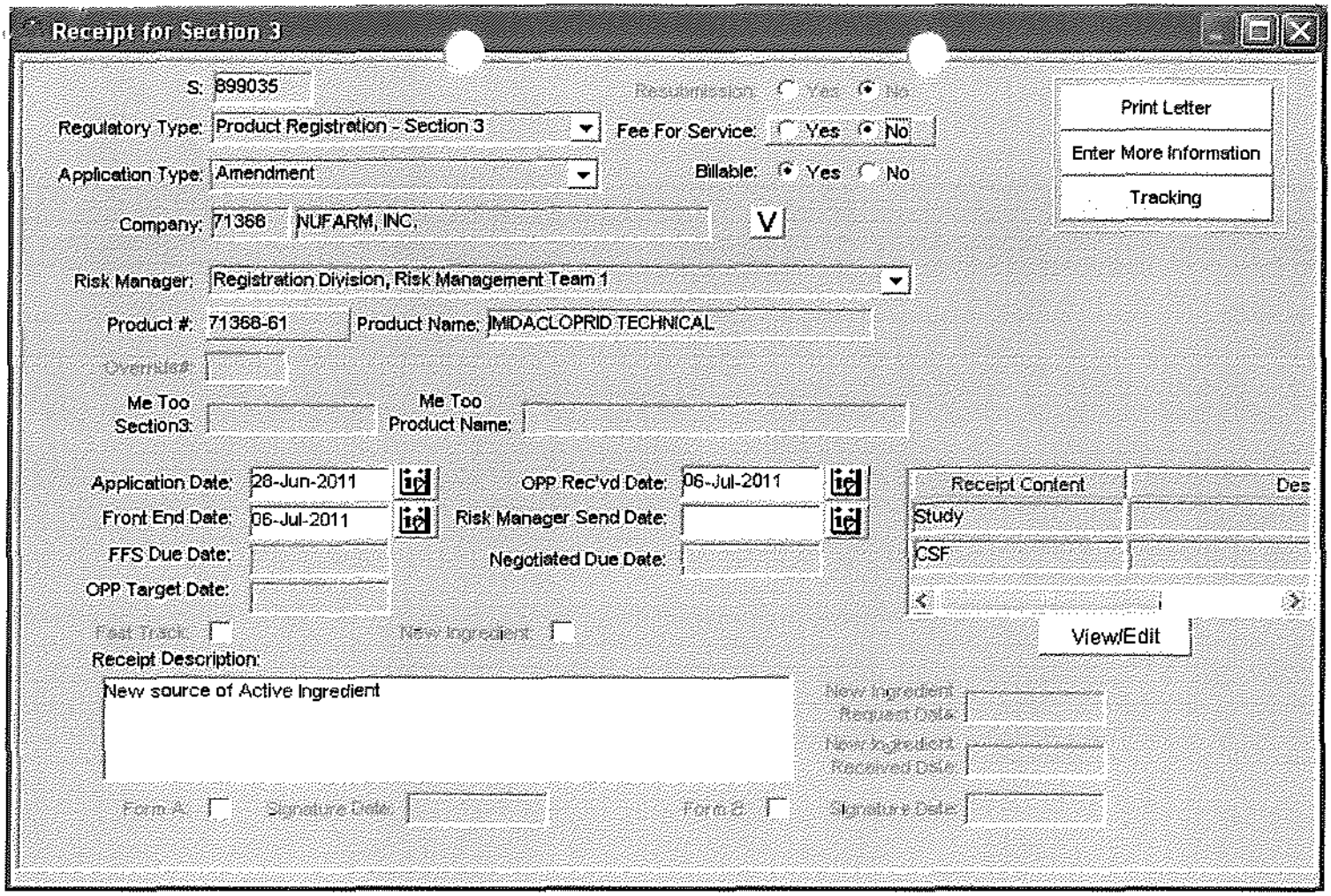
OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MATHEW GRANAHAN
NUFARM, INC.
150 HARVESTER DRIVE SUITE 200
BURR RIDGE, IL 60527

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 06-JUL-11. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.


Receipt for Section 3
S: B99035
Resubmission: Yes No
Regulatory Type: Product Registration - Section 3
Fee For Service: Yes No
Application Type: Amendment
Billable: Yes No
Company: 71368 NUFARM, INC.
Print Letter
Enter More Information
Tracking
Risk Manager: Registration Division, Risk Management Team 1
Product #: 71368-61
Product Name: IMIDACLOPRID TECHNICAL
Override:
Me Too Section3:
Me Too Product Name:
Application Date: 28-Jun-2011
OPP Rec'vd Date: 06-Jul-2011
Front End Date: 06-Jul-2011
Risk Manager Send Date:
FFS Due Date:
Negotiated Due Date:
OPP Target Date:
Receipt Content
Des
Study
CSF
Fast Track:
New Ingredient:
View/Edit
Receipt Description:
New source of Active Ingredient
New Ingredient Request Date:
New Ingredient Received Date:
Form A:
Signature Date:
Form C:
Signature Date:

NUFARM INC.
501 Cascade Pointe Lane, Suite 103
Cary, NC 27513
Phone: 919-655-0018 ■ Fax: 919-342-5176

June 28, 2011

Venus Eagle (PM-01)
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

Subject: **Nufarm Inc.; imidacloprid Technical (EPA Reg. No. 71368-61)**
Non-Fast Track Amendment to Existing Registration- PRIA R340
New source of Active Ingredient

Dear Ms. Eagle:

Nufarm Limited is submitting an application to register a new source of imidacloprid active ingredient for imidacloprid Technical (71368-61). The new source of imidacloprid is identical or substantially similar in composition to the existing source(s).

Nufarm has determined that this action falls under PRIA Category R340. We have pre-paid the service fee for this action and provide the following records of payment:

Pay.gov Tracking ID: 253PBJUS
Agency Tracking ID: 74215444450

In support of this action, please find enclosed:

- Application for Pesticide Registration (8570-1)
- Certification with Respect to Citation of Data (8570-34)
- Data Matrix- Agency Internal & Public Use Copies (8570-35)
- Proposed Confidential Statement of Formula (8570-4) 3 copies dated (March 21, 2011)
- Study Volumes 2, 3, 4, 5 (Product Chemistry)

Please contact me at 919-655-0018 (or nathan.ehresman@us.nufarm.com) if you have any questions regarding this action.

Kind regards,

Nathan P. Ehresman
Director, Regulatory Affairs
Nufarm Americas Inc.

Subdivision D: Product Chemistry

Vol. No.	OPPTS No.	EPA GLN	Study References	MRID No.
1	N/A	N/A	**Adminstrative Documents**	
2	830.1550 830.1600 830.1620 830.1670 830.1700 830.1750 830.1800	61-1 61-2 61-2 61-3 62-1 62-2 62-3	Cooke, A. **Technical Imidacloprid, NUP-11024 Product Identity and Process.** June 27, 2011. Study Number RTP-11-031-REG. 129 pages.	**48528201**
3	830.1700	62-1	Rao, D. **Preliminary Analysis of Imidacloprid TGAI** March 23, 2011. Study Number: NC-2011-002. 136 pages.	**48528202**
4	830.6302 830.6303 830.6304 830.6313 830.6314 830.7000 830.7050 830.7200 830.7300 830.7370 830.7570 830.7840	63-2 63-3 63-4 63-13 63-14 63-12 -- 63-5 63-7 63-10 63-11 63-8	Li, H. **Product Properties Test Guidelines, Series 830, Group B, Office of Prevention, Pesticides, and Toxic Substances (OPPTS): 830.6302, 830.6303, 830.6304, 830.6313, 830.6314,** 830.7000, 830.7050, 830.7200, 830.7300, 830.7570, and 830.7840. April 30, 2008. Study Number NC-2007-028. 62 pages.	**48528203**
5	830.6315 830.6316 830.6317 830.6320 830.7950	63-15 63-16 63-17 63-20 63-9	Ehresman, N. **Waiver Request for Certain Data Requirements for Imidacloprid Technical (NUP-11024).** June 28, 2011. Study Number: RTP-11-031-REG-X. 6 pages.	**48528204**

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501 Cascade Pointe Lane, Suite 103
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Phone: 919-655-0018 ■ Fax: 919-342-5176

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- Study Volumes 2, 3, 4, 5 (Product Chemistry)

Please contact me at 919-655-0018 (or nathan.ehresman@us.nufarm.com) if you have any questions regarding this action.

Kind regards,

Nathan P. Ehresman
Director, Regulatory Affairs
Nufarm Americas Inc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date: June 28, 2011	EPA Reg. No./File Symbol: 71368-61	Page 1 of 8
Nufarm Inc. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527	Product: Imidacloprid Technical	

Ingredient: Imidacloprid (PC Code 129099)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS Series 830	Product Properties				
830.1550	Product identity and composition	Volume 2	Nufarm Inc. (071368)	Own	
830.1600	Description of materials used to produce the product	Volume 2	Nufarm Inc. (071368)	Own	
830.1620	Description of production process	Volume 2	Nufarm Inc. (071368)	Own	
830.1650	Description of formulation process	--	--	N/A	1
830.1670	Discussion of formation of impurities	Volume 2	Nufarm Inc. (071368)	Own	
830.1700	Preliminary analysis	Volume 3	Nufarm Inc. (071368)	Own	
830.1750	Certified limits	Volume 2	Nufarm Inc. (071368)	Own	
830.1800	Enforcement analytical method	Volume 2	Nufarm Inc. (071368)	Own	
830.1900	Submittal of samples	--	--	N/A	2
830.6302	Color	Volume 4	Nufarm Inc. (071368)	Own	
830.6303	Physical state	Volume 4	Nufarm Inc. (071368)	Own	
830.6304	Odor	Volume 4	Nufarm Inc. (071368)	Own	
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	Volume 4	Nufarm Inc. (071368)	Own	
830.6314	Oxidation/reduction: chemical incompatibility	Volume 4	Nufarm Inc. (071368)	Own	

Signature	Name and Title	Date
	Nathan P. Ehresman / Director, Regulatory Affairs	June 28, 2011

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DATA MATRIX

Date: June 28, 2011	**EPA Reg. No./File Symbol:** 71368-61	Page 2 of 8
Nufarm Inc. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527	**Product:** Imidacloprid Technical	

Ingredient: Imidacloprid (PC Code 129099)

830.6315	Flammability	Volume 5	Nufarm Inc (071368)	Own	
830.6316	Explodability	Volume 5	Nufarm Inc (071368)	Own	
830.6317	Storage stability	Volume 5	Nufarm Inc (071368)	Own	
830.6319	Miscibility	--	--	N/A	3
830.6320	Corrosion characteristics	Volume 5	Nufarm Inc (07 t368)	Own	
830.6321	Dielectric breakdown voltage	--	--	N/A	4
830.7000	pH	Volume 4	Nufarm Inc. (071368)	Own	
830.7050	UV/Visible absorption	Volume 4	Nufarm Inc. (071368)	Own	
830.7100	Viscosity	--	--	N/A	5
830.7200	Melting point/melting range	Volume 4	Nufarm Inc. (071368)	Own	
830.7220	Boiling point/boiling range	--	--	N/A	6
830.7300	Density/relative density/bulk density	Volume 4	Nufarm Inc. (071368)	Own	
830.7370	Dissociation constants in water	Volume 4	Nufarm Inc. (071368)	Own	
830.7520	Particle size, fiber length, and diameter distribution	--	--	N/A	7
830.7550	Partition coefficient (n-octanol/water), shake flask method	Volume 4	Nufarm Inc. (071368)	Own	
830.7840	Water solubility: column elution method; shake flask method	Volume 4	Nufarm Inc. (071368)	Own	

Signature	Name and Title	Date
	Nathan P. Ehresman / Director, Regulatory Affairs	June 28, 2011

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DATA MATRIX

Date: June 28, 2011	EPA Reg. No./File Symbol: 71368-61	Page 3 of 8
Nufarm Inc. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527	Product: Imidacloprid Technical	

Ingredient: Imidacloprid (PC Code 129099)

830.7950	Vapor pressure	Volume 5	Nufarm Inc (071368)	Own	

Footnotes:

1 Description of Formulation Process (OPPTS 830.1620) data are not required as **Imidacloprid Technical** consists solely of technical grade active ingredient (40 CFR § 158.335) and is not a formulated product.
2 Submittal of Samples (OPPTS 830.1900) data are not required as **Imidacloprid Technical** is not a new active ingredient (40 CFR § 158.310(e))
3 Miscibility (OPPTS 830.6319) data are not required as **Imidacloprid Technical** is not an emulsifiable liquid (40 CFR § 158.310(e))
4 Dielectric Breakdown Voltage (OPPTS 830.6321) data are not required as **Imidacloprid Technical** is a TGAI (40 CFR § 158.310(e))
5 Viscosity (OPPTS 830.7100) data are not required as **Imidacloprid Technical** is a liquid (40 CFR § 158.310(e))
6 Boiling Point (OPPTS 830.7220) data are not required as **Imidacloprid Technical** is not a liquid at room temperature (40 CFR § 158.310(e))
7 Particle Size (OPPTS 830.7520) data are not required as **Imidacloprid Technical** is not water insoluble or fibrous (40 CFR § 158.310(e))

Signature	Name and Title	Date
	Nathan P. Ehresman / Director, Regulatory Affairs	June 28, 2011

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Date: June 28, 2011	**EPA Reg. No./File Symbol:** 71368-61	Page 4 of 8
Nufarm Inc. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527	**Product:** Imidacloprid Technical	

Ingredient: Imidacloprid (PC Code 129099)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS Series 870	**Health Effects**				
870.1100	Acute oral toxicity - rat	Cite-All	--	PAY	
870.1200	Acute dermal toxicity - rabbit	Cite-All	--	PAY	
870.1300	Acute inhalation toxicity - rat	Cite-All	--	PAY	
870.2400	Primary eye irritation - rabbit	Cite-All	--	PAY	
870.2500	Primary dermal irritation -rabbit	Cite-All	--	PAY	
870.2600	Dermal sensitization - Guinea pig	Cite-All	--	PAY	

Signature	Name and Title	Date
	Nathan P. Ehresman / Director, Regulatory Affairs	June 28, 2011

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DATA MATRIX

Date: June 28, 2011	EPA Reg. No./File Symbol: 71368-61	Page 5 of 8
Nufarm Inc. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527	Product: Imidacloprid Technical	

Ingredient: Imidacloprid (PC Code 129099)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter (EPA CO#)	Status	Note
Imidacloprid (PC 129099) Generic Data Requirements					
Imidacloprid Generic Data Requirements	Cite-All		Syngenta Crop Protection, Inc. (000100)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Bayer CropScience LP (000264)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		FMC Corp. Agricultural Products Group (000279)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Chemtura Corporation (000400)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Bayer Environmental Sciences (000432)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		The Scotts Company (000538)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		PBI/Gordon Corporation (002217)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Bayer Corporation (003125)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Helena Chemical Company (005905)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Gustafson LLC (007501)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		J. J. Mauget Company (007946)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		The Andersons Lawn Fertilizer Division (009198)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Chemical Specialties Inc. (010356)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Bayer Healthcare LLC (011556)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Mitsui Chemicals, Inc. (033657)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Loveland Products, Inc. (034704)	PAY	

Signature	Name and Title	Date
	Nathan P. Ehresman / Director, Regulatory Affairs	June 28, 2011

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DATA MATRIX

Date: June 28, 2011	EPA Reg. No./File Symbol: 71368-61	Page 6 of 8
Nufarm Inc. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527	Product: Imidacloprid Technical	

Ingredient: Imidacloprid (PC Code 129099)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter (EPA CO#)	Status	Note
Imidacloprid (PC 129099) Generic Data Requirements					
Imidacloprid Generic Data Requirements	Cite-All		Lanxess Corporation (039967)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Spray Drift Task Force (066607)	OWN	Footnote 1
Imidacloprid Generic Data Requirements	Cite-All		Albaugh Inc. (042750)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Aeroxon Inc. (043419)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Control Solutions (053883)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Outdoor Residential Exposure Task Force, LLC (071754)	OWN	Footnote 1
Imidacloprid Generic Data Requirements	Cite-All		Agricultural Reentry Task Force (071755)	OWN	Footnote 1
Imidacloprid Generic Data Requirements	Cite-All		Makhteshim-Agan of North America, Inc. (066222)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		FIFRA Endangered Species Task Force, LLC (073989)	OWN	Footnote 1
Imidacloprid Generic Data Requirements	Cite-All		Cheminova, Inc. (067760)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Residential Exposure Joint Venture (REJV) (074888)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Agricultural Handlers Exposure Task Force (075234)	OWN	Footnote 1
Imidacloprid Generic Data Requirements	Cite-All		Mycogen Seeds (068467)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Arbor Systems, Inc. (069117)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Pet Logic, LLC (069332)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Repar Corp (069361)	PAY	

Signature	Name and Title	Date
	Nathan P. Ehresman / Director, Regulatory Affairs	June 28, 2011

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DATA MATRIX

Date: June 28, 2011	EPA Reg. No./File Symbol: 71368-61	Page 7 of 8
Nufarm Inc. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527	Product: Imidacloprid Technical	

Ingredient: Imidacloprid (PC Code 129099)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter (EPA CO#)	Status	Note
Imidacloprid (PC t29099) Generic Data Requirements					
Imidacloprid Generic Data Requirements	Cite-All		United Phosphorus, Inc. (069811)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Nufarm, Inc. (071368)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Bayer Advanced (072155)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Scimetrics, Ltd. Corp. (072500)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Zelam Ltd. (072616)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Rockwell Laboratories, Ltd. (073079)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Sapstain Industry Group (SIG) (073154)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Univar USA Inc. (073748)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Innovative Pest Control Products (073766)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Arborjet (074578)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Arch Treatment Technologies, Inc. (075506)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Gro-Pro, LLC (079676)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Rotam Ltd. (081598)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Etigra LLC (081959)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Ensystex III, Inc. (082957)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Rotam Agrochemical Company Limited (083100)	PAY	

Signature	Name and Title	Date
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DATA MATRIX

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Nufarm Inc. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527	Product: Imidacloprid Technical	

Ingredient: Imidacloprid (PC Code 129099)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter (EPA CO#)	Status	Note
Imidacloprid (PC 129099) Generic Data Requirements					
Imidacloprid Generic Data Requirements	Cite-All		Sharda USA LLC (083529)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Celsius Property B.V., Amsterdam (NL) (083558)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Amtide, LLC (83851)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Ensystex IV, Inc. (083923)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Dalian Chemphy Chemicals Co., Ltd. (073467)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Generic Endangered Species Task Force (GESTF) (084653)	OWN	Footnote 1

FOOTNOTES

1. Nufarm Americas, Inc. is a member of this task force.

Signature	Name and Title	Date
	Nathan P. Ehresman / Director, Regulatory Affairs	June 28, 2011

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address and Telephone Number	EPA Registration Number/ File Symbol
Nufarm Inc., 150 Harvester Drive, Suite 200, Burr Ridge, IL 60527-0866 (919-655-0018)	**71368-61**
Active Ingredient(s) and/or representative test compound(s): **Imidacloprid (PC Code 129099)**	Date **June 28, 2011**
General use pattern(s) (list all those claimed for this product using 40 CFR Part 158) **Terrestrial food crop, Terrestrial feed crop, Greenhouse food crop, Indoor food, Terrestrial nonfood crop, Greenhouse nonfood crop, Residential outdoor, Indoor nonfood, Forestry**	Product Name **Imidacloprid Technical**

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

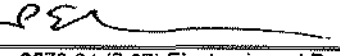
I certify that this application for registration, this form for reregistration, or this Data Call-In Notice is supported by all data submitted or cited in the application for registration, the form for reregistration, or this Data Call-In response. In addition, if cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original submitter or that I have obtained the written permission of the original submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the written permission of the original data submitter to use this study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Signature	Date	Typed or Printed Name and Title
	**June 28, 2011**	**Nathan P. Ehresman f Director, Regulatory Affairs**

EPA Form 8570-34 (9-97) Electronic and Paper versions available. Submit only Paper version.

Subdivision D: Product Chemistry

Vol. No.	OPPTS No.	EPA GLN	Study References	MRID No.
1	N/A	N/A	**Adminstrative Documents**	
2	830.1550 830.1600 830.1620 830.1670 830.1700 830.1750 830.1800	61-1 61-2 61-2 61-3 62-1 62-2 62-3	Cooke, A. **Technical Imidacloprid, NUP-11024 Product Identity and Process.** June 27, 2011. Study Number RTP-11-031-REG. 129 pages.	
3	830.1700	62-1	Rao, D. **Preliminary Analysis of Imidacloprid TGAI** March 23, 2011. Study Number: NC-2011-002. 136 pages.	
4	830.6302 830.6303 830.6304 830.6313 830.6314 830.7000 830.7050 830.7200 830.7300 830.7370 830.7570 830.7840	63-2 63-3 63-4 63-13 63-14 63-12 -- 63-5 63-7 63-10 63-11 63-8	Li, H. **Product Properties Test Guidelines, Series 830, Group B, Office of Prevention, Pesticides, and Toxic Substances (OPPTS): 830.6302, 830.6303, 830.6304, 830.6313, 830.6314, 830.7000, 830.7050, 830.7200, 830.7300, 830.7570, and 830.7840.** April 30, 2008. Study Number NC-2007-028. 62 pages.	
5	830.6315 830.6316 830.6317 830.6320 830.7950	63-15 63-16 63-17 63-20 63-9	Ehresman, N. **Waiver Request for Certain Data Requirements for Imidacloprid Technical (NUP-11024).** June 28, 2011. Study Number: RTP-11-031-REG-X. 6 pages.	

PRIA 2 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

3/23/09

21 Day Screen Start Date: 7-6-11

Experts In-Processing Signature: MF HARRINGTON Date 7-7-11 Fee Paid: Yes __

Division management contacted on issues No_____ Yes _____ Date _____

EPA Reg. Number: 71368-61	EPA Receipt Date: 7-6-11

	Items for Review			Yes	No	N/A*
1	**Application Form** (EPA Form 8570-1)(link to form) signed & complete including package type			X		
2	**Confidential Statement of Formula** all boxes completed, form signed, and dated (EPA Form 8570-4) (Link to form)			X		
	a) All inerts (link to http://www.epa.gov/opprd001/inerts/), including fragrances, approved for the proposed uses (see Footnote A)	yes: X	no:			
3	**Certification with Respect to Citation of Data** (EPA Form 8570-34) (Link to form) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes:	no:			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	**Formulator's Exemption Statement** (EPA Form 8570-27) (Link to form) completed and signed (N/A if source is unregistered or applicant owns the technical)					X
5	**Data Matrix** (EPA Form 8570-35) (Link to form) both internal and external copies (PR 98-5) (Link to PR 98-5) completed and signed (N/A if 100% repack)			X		
	a) Selective Method (Fee category experts use)	yes: X	no:			
	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	**5 Copies of Label** (link to **http://www.epa.gov/oppfead1/labeling/lrm/**) **(Electronic labels on CD are encouraged and guidance is available)**(**link to** http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels)				X	

7	**Is the data package consistent with PR Notice 86-5** (link to PRN 86-5)	X		
8	**Notice of Filing (link to http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm) included with petitions (link to http://www.epa.gov/pesticides/regulating/tolerances.htm)**			X
9	**If applicable for conventional applications, reduced risk rationale (link to http://www.epa.gov/opprd001/workplan/reducedrisk.html)**			X
10	**Required Data (link to http://www.epa.gov/pesticides/regulating/data_requirements.htm) and/or data waivers. See Footnote C.**			X
	a) List study (or studies) not included with application			

Comments:

STUDIES PASSED 86-5 REVIEW. AA 7/15/11

MRID 485282

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses. If an unapproved inert is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses **even if a product is currently registered** by consulting the inert Web

site [link to http://www.epa.gov/opprd001/inerts/lists.html] and if the inert is not approved, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient.** Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch [Link to http://www.epa.gov/oppbppd1/biopesticides/contacts_bppd.htm].

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information [link to http://www.epa.gov/opprd001/inerts/tips.pdf] must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or

2. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R311, R312 or R313), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or

2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or

2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

Material Sent for Data Extraction

Reg. # 71368-41

Description: _____

☐ Material(s) Sent to Data Extraction Contractors:

- ☑ New Stamped Label Dated 12/29/10
- ☐ Notification Dated _____
- ☐ New CSF(s) Dated _____
- ☐ Other: _____

☐ Decision #: _____

☐ Other Action/Comments: _____

_____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Autumn Metzger

Phone: 305-5314 Division: RD - IRB

Date: 10/19/11

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

DEC 2 9 2010

Nathan Ehresman
Nufarm Americas Inc.
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527

Dear Mr. Ehresman:

Subject: Fast track amendment to add use sites to technical label
Imidacloprid Technical
EPA Registration No. 71368-61
Your Submissions Dated 10/06/10

The labeling referred to above submitted in connection with the Federal Insecticide, Fungicide and Rodenticide Act, is amended as acceptable provided you make the following change:

Under the DIRECTIONS FOR USE section, delete the word "general" in the last sentence of the first paragraph so the sentence will read "This product is for manufacturing use only and is intended for formulation into end use products with the following use patterns:"

A stamped copy of the labeling is enclosed for your records. Please submit one final printed copy of the labeling before releasing the product for shipment. If you have any questions regarding this label, please contact Autumn Metzger at (703) 305-5314.

Sincerely,

Venus Eagle

Venus Eagle
Product Manager 01
Insecticide-Rodenticide Branch
Registration Division (7505P)

Imidacloprid Technical

FOR USE IN THE MANUFACTURE OF INSECTICIDES

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-*N*-nitro-2-imidazolidinimine	98.0%
OTHER INGREDIENTS:	2.0%
TOTAL	100.0%

EPA Reg. No. 71368-61 EPA Est. No._____

KEEP OUT OF REACH OF CHILDREN

WARNING

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300
For Medical Emergencies Only, Call (877) 325-1840

FIRST AID	
IF SWALLOWED	• Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF INHALED	• Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
IF ON SKIN OR CLOTHING	• Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
IF IN EYES	• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-325-1840 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat symptomatically.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

May be fatal if swallowed. Do not breathe dust or vapor. Do not get in eyes, on skin or on clothing. Wash thoroughly with soap andwater after handling and before eating, drinking or using tobacco products. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is for manufacturing use only and is intended for formulation into end use products with the following general use patterns:

Terrestrial Food Crop, Terrestrial Feed Crop, and Greenhouse Food Crop Uses: Apple, Banana, Barley, Blueberry, Bushberry, Caneberry, Canola, Citrus, Coffee, Cotton, Cranberry, Cucurbit Vegetables, Globe Artichoke, Grape, Greenhouse Vegetables, Fruiting Vegetables, Herbs, Head and Stem Brassica Vegetables, Leafy Vegetables, Leafy Petiole Vegetables, Legume Vegetables, Hop, Peanut, Pecan, Plantain, Pomegranate, Pome Fruit, Potato, Root Vegetables, edible seed crops for Sorghum, Soybeans, Sugarbeet, Strawberry, Stone Fruit, Sunflower, Tobacco, Tree Nuts, Tropical Fruit, Tuberous and Corm Vegetables, and Wheat.

Terrestrial Nonfood Crop and Greenhouse Nonfood Crop: Turfgrass, Sod Farms, Production Ornamentals (Trees, Shrubs, Container plants Bedding plants) in Nurseries, Christmas trees.

Forestry Uses: Forest tree nurseries, Poplar, Cottonwood

Residential Outdoor Uses: Landscape ornamentals (trees, shrubs, container & bedding plants), Lawns, Residential gardens and orchards, Structural pest control, Wood and wood structure protection.

Residential Indoor Uses: Interior scapes, Interior plantscapes.

Indoor food and Indoor nonfood Uses: General insect control and structural pest control within domestic dwellings, commercial, food processing, health care, institutional, industrial, and public buildings.

All other uses for which the USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.

Uses for experimental purposes that are in compliance with EPA requirements.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional office for guidance.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Completely container into manufacturing equipment. Offer for recycling if available or dispose of container in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

WARRANTY DISCLAIMER

The directions for use of this product must be followed carefully. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, (1) THE GOODS DELIVERED TO YOU ARE FURNISHED "AS IS" BY MANUFACTURER OR SELLER AND (2) MANUFACTURER AND SELLER MAKE NO WARRANTIES, GUARANTEES, OR REPRESENTATIONS OF ANY KIND TO BUYER OR USER, EITHER EXPRESS OR IMPLIED, OR BY USAGE OF TRADE, STATUTORY OR OTHERWISE, WITH REGARD TO THE PRODUCT SOLD, INCLUDING, BUT NOT LIMITED TO MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE, USE, OR ELIGIBILITY OF THE PRODUCT FOR ANY PARTICULAR TRADE USAGE. UNINTENDED CONSEQUENCES, INCLUDING BUT NOT LIMITED TO INEFFECTIVENESS, MAY RESULT BECAUSE OF SUCH FACTORS AS THE PRESENCE OR ABSENCE OF OTHER MATERIALS USED IN COMBINATION WITH THE GOODS, OR THE MANNER OF USE OR APPLICATION, INCLUDING WEATHER, ALL OF WHICH ARE BEYOND THE CONTROL OF MANUFACTURER OR SELLER AND ASSUMED BY BUYER OR USER. THIS WRITING CONTAINS ALL OF THE REPRESENTATIONS AND AGREEMENTS BETWEEN BUYER, MANUFACTURER AND SELLER, AND NO PERSON OR AGENT OF MANUFACTURER OR SELLER HAS ANY AUTHORITY TO MAKE ANY REPRESENTATION OR WARRANTY OR AGREEMENT RELATING IN ANY WAY TO THESE GOODS.

LIMITATION OF LIABILITY

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL MANUFACTURER OR SELLER BE LIABLE FOR SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES, OR FOR DAMAGES IN THEIR NATURE OF PENALTIES RELATING TO THE GOODS SOLD, INCLUDING USE, APPLICATION, HANDLING, AND DISPOSAL. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, MANUFACTURER OR SELLER SHALL NOT BE LIABLE TO BUYER OR USER BY WAY OF INDEMNIFICATION TO BUYER OR TO CUSTOMERS OF BUYER, IF ANY, OR FOR ANY DAMAGES OR SUMS OF MONEY, CLAIMS OR DEMANDS WHATSOEVER, RESULTING FROM OR BY REASON OF, OR RISING OUT OF THE MISUSE, OR FAILURE TO FOLLOW LABEL WARNINGS OR INSTRUCTIONS FOR USE, OF THE GOODS SOLD BY MANUFACTURER OR SELLER TO BUYER. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER, USER, OR ITS CUSTOMERS. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BUYER'S OR USER'S EXCLUSIVE REMEDY, AND MANUFACTURER'S OR SELLER'S TOTAL LIABILITY SHALL BE FOR DAMAGES NOT EXCEEDING THE COST OF THE PRODUCT.

If you do not agree with or do not accept any of directions for use, the warranty disclaimers, or limitations on liability, do not use the product, and return it unopened to the Seller, and the purchase price will be refunded.

Product of China
NET WEIGHT: _____ lbs (_____kgt

(RV122310)

Manufactured for
NUFARM, INC.
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527

ACCEPTED
With COMMENTS
In EPA Letter Dated:
DEC 29 2010
Under the Federal Insecticide, Fungicide and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg. No:
71368-61

Nufarm

071368-00061.20101223.Amended_label

Re: label comments for 71368-61 Imidacloprid Tech

nathan.ehresman to: Autumn Metzger 12/23/2010 06:07 AM

resubmission

S888051

Here you go. Happy holidays to you also. Thanks

Nathan P. Ehresman
Director, Regulatory Affairs
Nufarm Americas, Inc.
501 Cascade Pointe Lane, Suite 103
Cary, NC 27513
Phone: 919.655.0018
Fax: 919.342.5176
Mobile: 630.418.6035
nathan.ehresman@us.nufarm.com

From: Metzger.Autumn@epamail.epa.gov
To: nathan.ehresman@us.nufarm.com
Date: 12/22/2010 12:33 PM
Subject: label comments for 71368-61 Imidacloprid Tech

Hi,

The only 2 comments I have for the tech you submitted are:

under Directions for Use:

in the section labeled "Residential Outdoor Uses:" revise "Home gardens and orchards" to read "Residential gardens and orchards"

revise the sentence that reads "All other uses for which USEPA has accepted the required date..." to read "All other uses for which USEPA has accepted the required data..."

At your earliest connivence send me back a clean copy of this label for signature.

Have a nice holiday!

thanks,

Autumn Metzger
Biologist
U.S. Environmental Protection Agency
Insecticide-Rodenticide Branch
Registration Division (7505P)
1200 Pennsylvania Ave. NW
Washington, DC 20460

Tel: 703 305-5314
Fax: 703 308-5433
Email: metzger.autumn@epa.gov

Fax: +1 630 455 2001. 071368-00061.20101223.Amended_label.pdf

PM 1

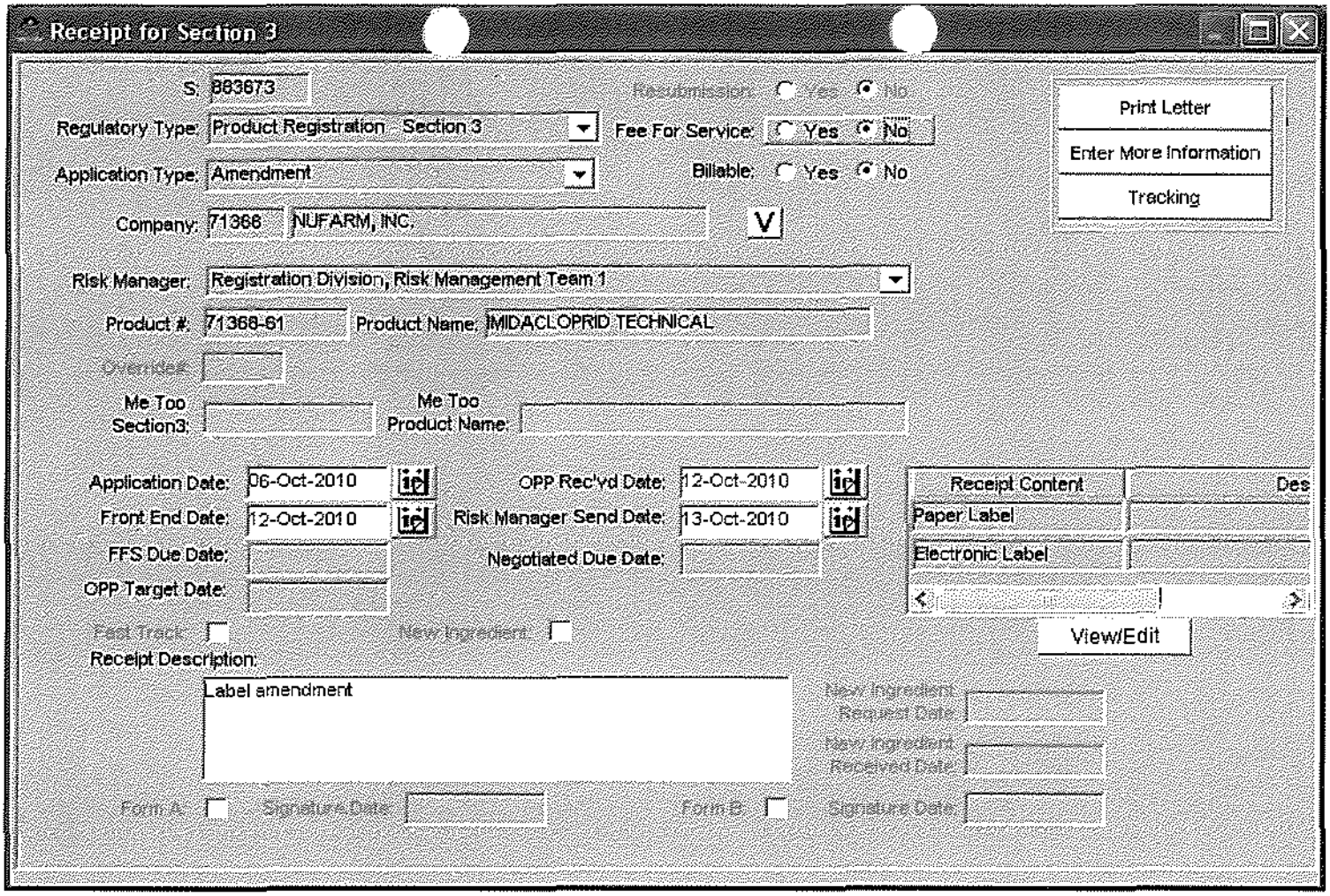
FAST-TRACK AMENDMENTS–Completeness Screening Checklist

Experts In-Processing Signature: ___ Hill

EPA Reg. Number: 71308-61	EPA Receipt Date: 10/12/10		

	Check List Item	Yes	No	NA
1	**Application Form** (EPA Form 8570-1) –signed?	X		
2	**Confidential Statement of Formula** (EPA Form 8570-29) – signed?			X
3	**Certification with Respect to Citation of Data** (EPA Form 8570-34) signed?	X		
4	**Formulator's Exemption Statement** (EPA Form 8570-27) - signed?			
5	**Data Matrix** (EPA Form 8570-35) [Applicable, for adding me-too uses]	X		
	a) Selective Method?			
	b) Cite-All Method? Applicant owns data or list only the companies offered to pay	X		
	c) Public copy of Matrix provided? See PR Notice 98-5	X		
6	**Is Label Included? (5 copies)**	X		
	Comments: New crops			

Autumn


Receipt for Section 3
S: 883673
Resubmission: Yes No
Regulatory Type: Product Registration - Section 3
Fee For Service: Yes No
Application Type: Amendment
Billable: Yes No
Company: 71368 NUFARM, INC.
Print Letter
Enter More Information
Tracking
Risk Manager: Registration Division, Risk Management Team 1
Product #: 71368-61
Product Name: IMIDACLOPRID TECHNICAL
Overrides:
Me Too Section3:
Me Too Product Name:
Application Date: 06-Oct-2010
OPP Rec'vd Date: 12-Oct-2010
Front End Date: 12-Oct-2010
Risk Manager Send Date: 13-Oct-2010
FFS Due Date:
Negotiated Due Date:
OPP Target Date:
Receipt Content
Des
Paper Label
Electronic Label
View/Edit
Fast Track:
New Ingredient:
Receipt Description:
Label amendment
New Ingredient Request Date:
New Ingredient Received Date:
Form A:
Signature Date:
Form B:
Signature Date:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 13, 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MATHEW GRANAHAN
NUFARM, INC.
150 HARVESTER DRIVE SUITE 200
BURR RIDGE, IL 60527

PRODUCT NAME: IMIDACLOPRID TECHNICAL
COMPANY NAME: NUFARM, INC.
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 71368-61
EPA RECEIPT DATE: 10/12/10

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

P. K. Nurse
Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service

{883673B~

This package includes the following

- ○ New Registration
- ◉ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ___

for Division

- ○ AD
- ○ BPPD
- ◉ RD

Risk Mgr. 1

Receipt No. S-	883673
EPA File Symbol/Reg. No.	71368-61
Pin-Punch Date:	10/12/2010

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: $ _____

Parent/Child Decisions:

☒ Inert Cleared for Intended Use ☒ Uncleared Inert in Product

Reviewer: _____ Date: 10/13/10

Remarks:

Please read instructions on reverse before completing form. Form Approved, OMB No. 2070-0060, Approval expires 05-31-98

EPA

United States
Environmental Protection Agency
Washington, DC 20460

☐ **Registration**
☒ **Amendment**
☐ **Other:**

OPP Identifier Number

Application for Pesticide – Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
71368-61	**Venus Eagle**	☒ None ☐ Restricted
4. Company/Product (Name) **Nufarm Inc./** **Imidacloprid Technical**	PM# **01**	
5. Name and Address of Applicant *(Include ZIP Code)* **Nufarm Inc** **150 Harvester Drive, Suite 200** **Burr Ridge, IL 60527** ☐ *Check if this is a new address*	6. **Expedited Review.** In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name: _____	

Section – II

☒ Amendment – Explain below.
☐ Resubmission in response to Agency letter dated _____
☐ Notification - Explain below.
☐ Final printed labels in response to Agency letter dated _____
☐ "Me Too" Application
☐ Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Non-PRIA Action- label amendment, no data review
- **Redefinition of General Use Patterns & Addition of Several Crops to Crop-Specific Use list**
- **Update of Container Disposal PRN2007-4**

Section – III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
☐ Yes* ☒ No ***Certification must be submitted**	☐ Yes ☒ No If "Yes" Unit Packaging wgt. / No. per container	☐ Yes ☒ No If "Yes" Package wgt. / No. per container	☐ Metal ☒ Plastic ☐ Glass ☐ Paper ☐ Other (Specify)

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
☒ Label ☐ Container	**25, 50 Kg**	☒ On Label ☐ On labeling accompanying product

6. Manner in Which Label is Affixed to Product ☐ Lithograph ☒ Paper glued ☐ Stenciled ☐ Other _____

Section – IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application)*

Name	Title	Telephone No. (Include Area Code)
Nathan P. Ehresman	**Director, Regulatory Affairs**	**919-655-0018**

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature	3. Title	6. Date Application Received
	Director, Regulatory Affairs	**(Stamped)**
4. Typed Name **Nathan P. Ehresman**	4. Date **October 06, 2010**	

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete — White- EPA File Copy (original) Yellow- Applicant Copy

NUFARM INC.
501 Cascade Pointe Lane, Suite 103
Cary, NC 27513
Phone: 919-655-0018 ■ Fax: 919-342-5176

October 06, 2010

Venus Eagle (PM-01)
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

Subject: **Nufarm Inc.; Imidacloprid Technical (EPA Reg. No. 71368-61)**
Label amendment with no data review
Update of Directions For Use-

Dear Ms. Eagle:

Nufarm Inc. is submitting the enclosed label amendment to update the Directions for use (General Use Patterns) and Specific Use Lists under the Redefined General Use patterns for our Imidacloprid Technical (71368-61). In addition, Nufarm is adding several crop uses to our technical label that appear on current approved end use product formulated from this technical product (Caneberry, Coffee, Globe artichoke, Herbs, Peanut, Plantain, Pomegranate, Soybeans, Tobacco, Tree Nuts. Christmas trees, Poplar/Cottonwood). With this label amendment we are also updating the label according to PRN2007-4 for container disposal instructions.

In support of this action, please find enclosed:

- Application for Pesticide Registration (8570-1)
- Certification with respect to citation of data (8570-34)
- Data Matrix (Agency Internal and Public use copies) (8570-35)
- Five (5) copies of the revised Imidacloprid Technical label (1 with major changes highlighted, 4 clean)
- An electronic copy of the proposed Imidacloprid Technical label (071368-00061.20101006.Amended_label)

As no data are being submitted with this amendment, nor will data need to be reviewed to approve the proposed labeling, Nufarm Inc. believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act of 2003.

Please contact me at 919-655-0018 (or nathan.ehresman@us.nufarm.com) if you have any questions regarding this submission.

Kind regards,

Nathan P. Ehresman
Product Registration Manager
Nufarm Americas, Inc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address and Telephone Number **Nufarm Inc., 150 Harvester Drive, Suite 200, Burr Ridge, IL 60527-0866** **(919-655-0018)**	EPA Registration Number/ File Symbol **71368-61**
Active Ingredient(s) and/or representative test compound(s): **Imidacloprid (PC Code 129099)**	Date **October 06, 2010**
General use pattern(s) (list all those claimed for this product using 40 CFR Part 158) **Terrestrial food crop, Terrestrial feed crop, Greenhouse food crop, Indoor food, Terrestrial nonfood crop, Greenhouse nonfood crop, Residential outdoor, Indoor nonfood, Forestry**	Product Name **Imidacloprid Technical**

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data Call-In Notice is supported by all data submitted or cited in the application for registration, the form for reregistration, or this Data Call-In response. In addition, if cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original submitter or that I have obtained the written permission of the original submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the written permission of the original data submitter to use this study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Signature	Date	Typed or Printed Name and Title
	October 6, 2010	Nathan P. Ehresman / Director, Regulatory Affairs

EPA Form 8570-34 (9-97) Electronic and Paper versions available. Submit only Paper version.

Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	**Date Submitted to EPA**	**Electronic file name**
071368-00061	October 06, 2010	071368-00061.20100610.Amended_label

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Signature

10-06-2010
Date

Nathan P. Ehresman
Name (typed)

Product Registration Manager
Title

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

DATA MATRIX

Date: October 06, 2010	**EPA Reg. No./File Symbol:** 71368-61	Page 1 of 9
Nufarm Inc. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527	**Product:** Imidacloprid Technical	

Ingredient: Imidacloprid (PC Code 129099)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS Series 830	**Product Properties**				
830.1550	Product identity and composition	46707601 47126701 47148401	Nufarm Inc. (071368)	Own	
830.1600	Description of materials used to produce the product	46707601 47126701 47148401	Nufarm Inc. (071368)	Own	
830.1620	Description of production process	46707601 47126701 47148401	Nufarm Inc. (071368)	Own	
830.1650	Description of formulation process	--	--	N/A	1
830.1670	Discussion of formation of impurities	46707601 47126701 47148401	Nufarm Inc. (071368)	Own	
830.1700	Preliminary analysis	46721901 47126702 47148402	Nufarm Inc. (071368)	Own	
830.1750	Certified limits	46707602 47126701 47148401	Nufarm Inc. (071368)	Own	

Signature	Name and Title	Date
	Nathan P. Ehresman / Product Registration Manager	October 06, 2010

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

DATA MATRIX

Date: October 06, 2010	EPA Reg. No./File Symbol: 71368-61	Page 2 of 9
Nufarm Inc. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527	Product: Imidacloprid Technical	

Ingredient: Imidacloprid (PC Code 129099)

830.1800	Enforcement analytical method	46707602 47126701 47148401	Nufarm Inc. (071368)	Own	
830.1900	Submittal of samples	--	--	N/A	2
830.6302	Color	46721902	Nufarm Inc. (071368)	Own	
830.6303	Physical state	46721902	Nufarm Inc. (071368)	Own	
830.6304	Odor	46721902	Nufarm Inc. (071368)	Own	
830.6313	Stability to normal and elevated temperatures, metals, and metal ions	46721903	Nufarm Inc. (071368)	Own	
830.6314	Oxidation/reduction: chemical incompatibility	46721904	Nufarm Inc. (071368)	Own	
830.6315	Flammability	--	--	N/A	3
830.6316	Explodability	--	--	N/A	4
830.6317	Storage stability	47315301	Etigra LLC (081959)	Own	
830.6319	Miscibility	--	--	N/A	5
830.6320	Corrosion characteristics	47315301	Etigra LLC (081959)	Own	
830.6321	Dielectric breakdown voltage	--	--	N/A	6
830.7000	pH	46721905 47126703	Nufarm Inc. (071368)	Own	
830.7050	UV/Visible absorption	46707608	Nufarm Inc. (071368)	Own	

Signature	Name and Title	Date
	Nathan P. Ehresman / Product Registration Manager	October 06, 2010

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Form Approved OMB No. 2070-0060

DATA MATRIX

Date: October 06, 2010	**EPA Reg. No./File Symbol:** 71368-61	Page 3 of 9
Nufarm Inc. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527	**Product:** Imidacloprid Technical	

Ingredient: Imidacloprid (PC Code 129099)

830.7100	Viscosity	--	--	N/A	7
830.7200	Melting point/melting range	46721906	Nufarm Inc. (071368)	Own	
830.7220	Boiling point/boiling range	--	--	N/A	8
830.7300	Density/relative density/bulk density	46721907 47126704	Nufarm Inc. (071368)	Own	
830.7370	Dissociation constants in water	47498603	Nufarm Inc. (071368)	Own	
830.7520	Particle size, fiber length, and diameter distribution	--	--	N/A	9
830.7550	Partition coefficient (n-octanol/water), shake flask method	46707611	Nufarm Inc. (071368)	Own	
830.7560	Partition coefficient (n-octanol/water), generator column method	--	--	N/A	10
830.7570	Partition coefficient (n-octanol/water), estimation by liquid chromotography	--	--	N/A	11
830.7840	Water solubility: column elution method; shake flask method	46707613 46721908	Nufarm Inc. (071368)	Own	
830.7860	Water solubility: generator column method	--	--	N/A	12
830.7950	Vapor pressure	46812301	Nufarm Inc. (071368)	Own	

Signature	Name and Title	Date
	Nathan P. Ehresman / Product Registration Manager	October 06, 2010

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DATA MATRIX

Date: October 06, 2010	EPA Reg. No./File Symbol: 71368-61	Page 4 of 9
Nufarm Inc. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527	Product: Imidacloprid Technical	
Ingredient: Imidacloprid (PC Code 129099)		

Footnotes:

1 Description of Formulation Process (OPPTS 830.1620) Data are not required as **Imidacloprid Technical** consists solely of technical grade active ingredient (40 CFR § 158.335)
2 Submittal of Samples (OPPTS 830.1900) Data are not required as **Imidacloprid Technical** is not a new active ingredient (40 CFR § 158.310(e))
3 Flammability (OPPTS 830.6315) Data are not required as **Imidacloprid Technical** does not contain any combustible liquids (40 CFR § 158.310(e))
4 Explodability (OPPTS 830.6316) Data are not required as **Imidacloprid Technical** is not potentially explosive (40 CFR § 158.310(e))
5 Miscibility (OPPTS 830.6319) Data are not required as **Imidacloprid Technical** is not an emulsifiable liquid (40 CFR § 158.310(e))
6 Dielectric Breakdown Voltage (OPPTS 830.6321) Data are not required as **Imidacloprid Technical** is a TGAI (40 CFR § 158.310(e))
7 Viscosity (OPPTS 830.7100) Data are not required as **Imidacloprid Technical** is a liquid (40 CFR § 158.310(e))
8 Boiling Point (OPPTS 830.7220) Data are not required as **Imidacloprid Technical** is not a liquid at room temperature (40 CFR § 158.310(e))
9 Particle Size (OPPTS 830.7520) Data are not required as **Imidacloprid Technical** is not water insoluble or fibrous (40 CFR § 158.310(e))
10 Partition Coefficient (OPPTS 830.7560) Data have been addressed for **Imidacloprid Technical** under OPPTS 830.7550
11 Partition Coefficient (OPPTS 830.7570) Data have been addressed for **Imidacloprid Technical** under OPPTS 830.7550
12 Water Solubility (OPPTS 830.7860) Data have been addressed for **Imidacloprid Technical** under OPPTS 830.7840.

Signature	Name and Title	Date
	Nathan P. Ehresman / Product Registration Manager	October 06, 2010

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WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

DATA MATRIX

Date: October 06, 2010	**EPA Reg. No./File Symbol:** 71368-61	Page 5 of 9
Nufarm Inc. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527	**Product:** Imidacloprid Technical	

Ingredient: Imidacloprid (PC Code 129099)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS Series 870	**Health Effects**				
870.1100	Acute oral toxicity - rat	Cite-All	--	PAY	
870.1200	Acute dermal toxicity - rabbit	Cite-All	--	PAY	
870.1300	Acute inhalation toxicity - rat	Cite-All	--	PAY	
870.2400	Primary eye irritation - rabbit	Cite-All	--	PAY	
870.2500	Primary dermal irritation -rabbit	Cite-All	--	PAY	
870.2600	Dermal sensitization - Guinea pig	Cite-All	--	PAY	

Signature	Name and Title	Date
	Nathan P. Ehresman / Product Registration Manager	October 06, 2010

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date: October 06, 2010	**EPA Reg. No./File Symbol:** 71368-6t	Page 6 of 9
Nufarm Inc. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527	**Product:** Imidacloprid Technical	

Ingredient: Imidacloprid (PC Code 129099)

Guideline Reference Number	Guidetine Study Name	MRID Number	Submitter (EPA CO#)	Status	Note
Imidacloprid (PC 129099) Generic Data Requirements					
Imidacloprid Generic Data Requirements	Cite-All		Syngenta Crop Protection, Inc. (000t00)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Bayer CropScience LP (000264)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		FMC Corp. Agricultural Products Group (000279)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Chemtura Corporation (000400)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Bayer Environmental Sciences (000432)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		The Scotts Company (000538)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		PBI/Gordon Corporation (002217)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Bayer Corporation (003125)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Helena Chemical Company (005905)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Gustafson LLC (007501)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		J. J. Mauget Company (007946)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		The Andersons Lawn Fertilizer Division (009t98)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Chemical Specialties Inc. (010356)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Bayer Healthcare LLC (011556)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Mitsui Chemicals, Inc. (033657)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Loveland Products, Inc. (034704)	PAY	

Signature	Name and Title	Date
	Nathan P. Ehresman / Product Registration Manager	October 06, 20t0

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401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

DATA MATRIX

Date: October 06, 2010	**EPA Reg. No./File Symbol:** 71368-61	Page 7 of 9
Nufarm Inc. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527	**Product:** Imidacloprid Technical	

Ingredient: Imidacloprid (PC Code 129099)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter (EPA CO#)	Status	Note
Imidacloprid (PC 129099) Generic Data Requirements					
Imidacloprid Generic Data Requirements	Cite-All		Lanxess Corporation (039967)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Spray Drift Task Force (066607)	OWN	Footnote 1
Imidacloprid Generic Data Requirements	Cite-All		Albaugh Inc. (042750)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Aeroxon Inc. (043419)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Control Solutions (053883)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Outdoor Residential Exposure Task Force, LLC (071754)	OWN	Footnote 1
Imidacloprid Generic Data Requirements	Cite-All		Agricultural Reentry Task Force (071755)	OWN	Footnote 1
Imidacloprid Generic Data Requirements	Cite-All		Makhteshim-Agan of North America, Inc. (066222)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		FIFRA Endangered Species Task Force, LLC (073989)	OWN	Footnote 1
Imidacloprid Generic Data Requirements	Cite-All		Cheminova, Inc. (067760)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Residential Exposure Joint Venture (REJV) (074888)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Agricultural Handlers Exposure Task Force (075234)	OWN	Footnote 1
Imidacloprid Generic Data Requirements	Cite-All		Mycogen Seeds (068467)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Arbor Systems, Inc. (069117)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Pet Logic, LLC (069332)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Repar Corp (069361)	PAY	

Signature	Name and Title	Date
	Nathan P. Ehresman / Product Registration Manager	October 06, 2010

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

DATA MATRIX

Date: October 06, 2010	EPA Reg. No./File Symbol: 71368-61	Page 8 of 9
Nufarm Inc. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527	Product: Imidacloprid Technical	

Ingredient: Imidacloprid (PC Code 129099)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter (EPA CO#)	Status	Note
Imidacloprid (PC 129099) Generic Data Requirements					
Imidacloprid Generic Data Requirements	Cite-All		United Phosphorus, Inc. (069811)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Nufarm, Inc. (071368)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Bayer Advanced (072155)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Scimetrics, Ltd. Corp. (072500)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Zelam Ltd. (072616)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Rockwell Laboratories, Ltd. (073079)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Sapstain Industry Group (SIG) (073154)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Univar USA Inc. (073748)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Innovative Pest Control Products (073766)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Arborjet (074578)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Arch Treatment Technologies, Inc. (075506)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Gro-Pro, LLC (079676)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Rotam Ltd. (081598)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Etigra LLC (081959)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Ensystex III, Inc. (082957)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Rotam Agrochemical Company Limited (083100)	PAY	

Signature	Name and Title	Date
	Nathan P. Ehresman / Product Registration Manager	October 06, 2010

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

DATA MATRIX

Date: October 06, 2010	**EPA Reg. No./File Symbol:** 71368-61	Page 9 of 9
Nufarm Inc. t50 Harvester Drive, Suite 200 Burr Ridge, IL 60527	**Product:** Imidacloprid Technical	

Ingredient: Imidacloprid (PC Code t29099)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter (EPA CO#)	Status	Note
Imidacloprid (PC 129099) Generic Data Requirements					
Imidacloprid Generic Data Requirements	Cite-All		Sharda USA LLC (083529)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Celsius Property B.V., Amsterdam (NL) (083558)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Amtide, LLC (83851)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Ensystex IV, Inc. (083923)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Dalian Chemphy Chemicals Co., Ltd. (073467)	PAY	
Imidacloprid Generic Data Requirements	Cite-All		Generic Endangered Species Task Force (GESTF) (084653)	OWN	Footnote 1

FOOTNOTES

1. Nufarm Americas, Inc. is a member of this task force.

Signature	Name and Title	Date
	Nathan P. Ehresman / Product Registration Manager	October 06, 2010

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PREVENTION,
PESTICIDES AND
TOXIC SUBSTANCES

March 12, 2009

I, Venus Eagle, Insecticide/Rodenticide Branch, Registration Division, Office of Pesticide Programs, Office of Prevention, Pesticides and Toxic Substances, United States Environmental Protection Agency ("EPA"), certify that the pesticide product (s) listed below is, as of the date of this letter, a registered product under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, and that as such, the product(s) may be sold and marketed in the United States of America as authorized and limited by FIFRA. A true and correct copy of the product label approved by EPA is attached to accompany this letter.

Registration of this product(s) with EPA also denotes that the registrant listed below is responsible for ensuring full compliance with all the laws of the United States of America, or governing jurisdiction, regarding the sale, storage and/or disposal of the product(s). Further, the recipient of this letter is on notice that the referenced registration and/or the accompanying label may change subsequent to the date of this letter. EPA assumes no responsibility to notify the recipient(s) (i.e., Sri Lanka) of this letter of any change in the status of the registration(s) and/or the product label for the product(s) listed below.

EPA has issued registration numbers for the product(s) listed below to:

Nufarm, Inc.
150 Harvester Drive Suite 200
Burr Ridge, IL 60527

EPA Registration Number: 71368-61
Name of Product: IMIDACLOPRID TECHNICAL

Venus Eagle
Risk Manager 01
Insecticide/Rodenticide Branch
Registration Division (7505P)

Nufarm

Via Email

March 2, 2009

Venus Eagle (PM 1)
Document Processing Desk (CERT)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

Subject: Gold Seal Certificate

Dear Ms. Eagle:

Please forward to my attention a gold seal certificate on EPA letterhead stating that the following Nufarm product is registered with the EPA. We intend to use this certificate in Sri Lanka.

Product Name	**EPA Reg. No.**
Imidacloprid Technical	71368-61

Please contact me at 919/655-0701 if you have any questions about this request.

Sincerely,

Lizbeth Rea
Registration Manager
Nufarm Americas Inc. AGT Division
Email: liz.rea@us.nufarm.com

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 21, 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MR. JEFF JONES
DELTA ANALYTICAL CORPORATION, AGENT FOR
FSTI, INC.
12510 PROSPERITY DRIVE, SUITE 160
SILVER SPRING, MD 20904

Dear Mr. Jones:

Subject: Transfer of Pesticide Registrations From Company Number 70271 to Company Number 86197

Pursuant to your request in your letter and transfer agreement of June 30, 2009, we have approved the transfer of the following registrations from **KIK INTERNATIONAL INC**, company number **70271** to **FSTI, INC.**, company number **86197**.

The effective date of these changes is the date of this letter.

Registered Products	Old EPA Reg. No.	New EPA Reg. No.
HUISH - SODIUM HYPOCHLORITE 12.5%	70271-17	86197-3
HUISH- SODIUM HYPOCHLORIDE 10.0%	70271-18	86197-4

You should indicate the new company designation, new EPA Registration Number and new Establishment Number (if it has changed) on the labeling at the next printing which should occur no later than 18 months after the effective date of this transfer. After 18 months, any product released for shipment must bear the new Registration Number and Establishment Number.

If you intend to use the labels which currently appear on the transferor's product after the effective date of the transfer, but within the 18 month grace period, you must maintain complete and accurate records which identify by batch number, lot number, or other suitable description the quantities of such product bearing the transferor's label. Each container or package bearing the transferor's label which is released after the effective date of product registration transfer, must be clearly and accurately marked with the batch number, lot number or other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental distributors of the transferred product(s) of this transfer agreement. If you wish to enter into supplemental distribution agreements of your product(s) under this new registration, the form "Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5, must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to distribution or sale of the product containing the new registration number. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

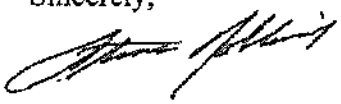
When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

With regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The marginal maintenance fee is determined based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

Sincerely,



Steve Robbins, Chief
Information Services Branch
Information Technology & Resource Management Div. (7504P)

cc: MS. CRISTINA GRIFFIN
DELTA INTERNATIONAL, INC., AGENT FOR
KIK INTERNATIONAL INC
12510 PROSPERITY DRIVE, SUITE 160
SILVER SPRING, MD 20904

RE: L_70271_REG_86197_09_21_2009

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

NOV 2 7 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. George Meindl
Nufarm Inc.
150 Harvester Drive Suite 200
Burr Ridge, IL 60527

Subject: Proposed Alternate Formulations
Imidacloprid Technical
EPA Reg. No. 71368-61
Your Submission date, June 4, 2007

Dear Mr. Meindl:

The Agency have received and reviewed your proposed alternate formulations for the above products dated May 23, 2007. The formulation is acceptable and has been added to the product record file. If there are questions call me at 703 305-5409.

Sincerely,

/S/

Dani Daniel
Insecticide-Rodenticide Branch
Registration Division 7505P

Manufacturing process information may be entitled to confidential treatment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

DATE: **November 21, 2007**

MEMORANDUM

TXR No.: 0054778

SUBJECT: Imidacloprid - Toxicological significance of impurities to an alternate CSF

FROM: Lisa Austin, Ph.D., Toxicologist
Registration Action Branch 1
Health Effects Division (7509P)

THROUGH: Pv Shah, Ph.D., Branch Senior Scientist
Registration Action Branch 1
Health Effects Division (7509P)

TO: Venus Eagle, Product Manager, RM-# 01
Registration Division (7505P)

DP Barcode: 345227 **PC Code:** 129099

Action Requested: The Registration Division (RD) requested Health Effects Division (HED) to assess the toxicological significance of the impurities, [redacted] and [redacted] found in an alternative CSF (known as NUP-06231) [redacted] The action was successfully completed, and the conclusion is reported here.

I. CONCLUSION

The Registration Action Branch I (RAB 1) has assessed the toxicological significance of [redacted]

[redacted] and has conducted a literature search. It is concluded that the alternative CSF with the added with the impurities, [redacted] and [redacted] from [redacted] to [redacted] by weight into the CSF do not pose a toxicological risk. [redacted] has shown toxicity following inhalation and acute oral ingestion at high doses. However, [redacted] constitutes [redacted] by weight of the CSF and is not expected to contribute to the overall toxicity of the CSF.

471484-00

Nufarm

Nufarm Inc.
George Meindl
Registration Manager
150 Harvester Drive Suite 200
Burr Ridge, IL 60527
Phone: 630.455.2017 Fax: 630.455.2030
george.meindl@us.nufarm.com

June 4, 2007

Via Overnight Courier

Venus Eagle (PM-1)
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Subject: Imidacloprid Technical
EPA Reg. No. 71368-61
Amendment to existing registration
Non- fast track request R34 (89)

Dear Ms. Eagle:

We would like to add another source to the existing subject registration. Under the Pesticide Registration Improvement Act of 2003, it is our opinion that this action falls under category R34 89, amendments/non-fast track. We believe this is the appropriate category since this application request is to amend an existing registration that includes reviewing product chemistry data. Therefore Nufarm anticipates this action requires a fee of $3150 and we would anticipate a four-month review time.

To process this request please find attached the transmittal document listing the administrative material and all submitted studies needed to support this registration request.

If you should have any questions regarding this matter, please feel free to contact me at 630.455.2017 or email at george.meindl@us.nufarm.com.

Sincerely,

George Meindl
Registration Manager
Nufarm Inc.

Nufarm Inc.
George Meindl
Registration Manager
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527
Phone: 630.455.2017 Fax: 630.455.2030
george.meindl@us.nufarm.com

TRANSMITTAL DOCUMENT

1. Name and Address of Submitter

   Nufarm Inc.
   150 Harvester Drive Suite 200
   Burr Ridge, IL 60527

2. Regulatory Action in Support of Which This Package is Submitted

   Application for Pesticide Registration
   Imidacloprid Technical
   EPA Reg. No. 71368-61
   PRIA category R34 89
   Amendment to existing registration/Non-fast track - this submission includes product chemistry to be reviewed

3. Date of this Submission

   June 4, 2007

4. List of Submitted Studies

Volume 1
Administrative Documents

PRIA letter
Application for Pesticide Registration (EPA form 8570-1)
Confidential Statement of Formula (EPA form 8570-4)

Volume 2
(3 copies of all studies)

47148401 Product Chemistry (Guidelines 830.1550 - 1800), which includes confidential attachment
47148402 Product Chemistry (Guidelines 830.1700)

Company Official: George Meindl Signature:

Company Name: Nufarm Inc.

Company Contact: George Meindl Phone: 630.455.2017
Registration Manager

Imidacloprid Technical

ACTIVE INGREDIENT:	
Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-*N*-nitro-2-imidazolidinimine	98%
OTHER INGREDIENTS:	2%
TOTAL	100%

EPA Reg. No. 71368-
EPA Est. No.

KEEP OUT OF REACH OF CHILDREN

WARNING

FIRST AID

IF SWALLOWED
Call a poison control center or doctor immediately for treatment advice.
Have person sip a glass of water if able to swallow.
Do not induce vomiting unless told to do so by the poison control center or doctor.
Do not give anything by mouth to an unconscious person.

IF INHALED
Move person to fresh air.
If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.
Call a poison control center or doctor for further treatment advice.

IF ON SKIN OR CLOTHING
Take off contaminated clothing.
Rinse skin immediately with plenty of water for 15 to 20 minutes.
Call a poison control center or doctor for treatment advice.

IF IN EYES
Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
Call a poison control center or doctor for treatment advice.

ACCEPTED
with COMMENTS
In EPA Letter Dated:
APR 20 2006
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 71368-64

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.
You may also contact 1-877-325-1840 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat symptomatically.

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING
May be fatal if swallowed. Do not breathe dust or vapor. Do not get in eyes, on skin or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco products. Remove contaminated clothing and wash before reuse.

ENVIRONMENTAL HAZARDS

NET CONTENTS:

NUFARM INC.
BURR RIDGE, IL 60527

This product is toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or public water unless this product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is for manufacturing use only and is intended for formulation into end use products for:

Terrestrial Non-food Crop, or Residential and Commercial Outdoor: Lawns, turfgrasses, ornamentals;

Terrestrial Food Crop: Apple, Banana, Barley, Blueberry, Bushberry, Canola, Citrus, Cotton, Cranberry, Cucurbit Vegetables, Grape, Greenhouse Vegetables, Fruiting Vegetables, Head and Stem Brassica Vegetables, Leafy vegetables, Leafy Petiole vegetables, Legume vegetables, Hop, Pecan, Pome fruit, Potato, ~~Prune garden beet, Roots and Tops,~~ Root vegetables, edible seed crops for Sorghum, Sugarbeet, Strawberry, Stone Fruit, Sunflower, Tropical Fruit, Tuberous and Corm Vegetables, and Wheat.

Greenhouse Non-food Crop or Residential and Commercial Indoor: Ornamentals

All other uses for which the USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration. Uses for experimental purposes that are in compliance with EPA requirements.

Detailed information on chemical and physical properties and other formulating recommendations for this product are available upon request from Nufarm Americas Inc. Obtain and read this information before undertaking the formulation of Imidacloprid Technical in order to avoid formulation hazards and insure a satisfactory finished product.

Labeling for products formulated from this product must conform to that which is currently registered with the U.S. Environmental Protection Agency. For specific information on federally registered uses, contact Nufarm Americas Inc.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

Handle and open container in a manner as to prevent spillage. If the container is leaking or material is spilled for any reason or cause, carefully sweep material into a pile and dispose of as directed for pesticides below.

Refer to Precautionary Statements on label for hazards associated with the handling of this material. In spill or leak incidents, keep unauthorized people away. You may contact Chemtrec (800) 424-9300.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Do not use container in connection with food, feed, or drinking water. Completely empty container into the processing equipment. Then dispose of empty container in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

For Chemical Spill, Leak, Fire, or Exposure, Call CHEMTREC (800) 424-9300
For Medical Emergencies Only, Call (877) 325-1840

WARRANTY STATEMENT

NUFARM INC. warrants that the product conforms to the chemical description on the label and is reasonably fit for the purposes set forth on the label when used according to directions under normal use conditions. THERE ARE NO OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING A WARRANTY OF FITNESS FOR A PARTICULAR PURPOSE. This warranty does not extend to the handling or use of this product contrary to label instructions or under abnormal conditions or under conditions not reasonably foreseeable to seller and buyer assumes all risk of any such use.

Prepared by GLM
(RV110105)

NET CONTENTS:

NUFARM INC.
BURR RIDGE, IL 60527

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SEP 19 2007

Mr. George Meindl
Nufarm Inc.
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527

Subject: Addition of another source for existing registration
Imidacloprid Technical
EPA Reg. No. 71368-61
Your Submission date, May 2, 2007

Dear Mr. Meindl:

The data submitted in reference to the labeling above, in connection with this registration under the Federal Insecticide, Fungicide, and Rodenticide Act is acceptable. The submitted data along with the submitted alternate confidential statement of formula dated May 30, 2007 is acceptable and has been added to the company's file. If there are questions call me at 703 305-5409.

Sincerely,

Dani Daniel
Insecticide-Rodenticide Branch
Registration Division 7505P

Nufarm

471267-00

Nufarm Inc.
George Meindl
Registration Manager
150 Harvester Drive Suite 200
Burr Ridge, IL 60527
Phone: 630.455.2017 Fax: 630.455.2030
george.meindl@us.nufarm.com

May 2, 2007

Via Overnight Courier

Venus Eagle (PM-1)
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Subject: Imidacloprid Technical
EPA Reg. No. 71368-61
Amendment to existing registration
Non- fast track request R34 (89)

Dear Ms. Eagle:

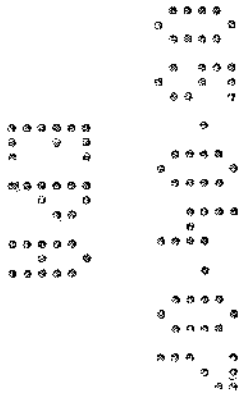
We would like to add another source to the existing subject registration. Under the Pesticide Registration Improvement Act of 2003, it is our opinion that this action falls under category R34 89, amendments/non-fast track. We believe this is the appropriate category since this application request is to amend an existing registration that includes reviewing product chemistry data. Therefore Nufarm anticipates this action requires a fee of $3150 and we would anticipate a four-month review time.

To process this request please find attached the transmittal document listing the administrative material and all submitted studies needed to support this registration request.

If you should have any questions regarding this matter, please feel free to contact me at 630.455.2017 or email at george.meindl@us.nufarm.com.

Sincerely,

George Meindl
Registration Manager
Nufarm Inc.



H:\imidacloprid\ alternate source cover letter submitted 5.2.2007.doc

Nufarm Inc.
George Meindl
Registration Manager
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527
Phone: 630.455.2017 Fax: 630.455.2030
george.meindl@us.nufarm.com

TRANSMITTAL DOCUMENT

1. Name and Address of Submitter

Nufarm Inc.
150 Harvester Drive Suite 200
Burr Ridge, IL 60527

2. Regulatory Action in Support of Which This Package is Submitted

Application for Pesticide Registration
Imidacloprid Technical
EPA Reg. No. 71368-61
PRIA category R34 89
Amendment to existing registration/Non-fast track - this submission includes product chemistry to be reviewed

3. Date of this Submission

May 2, 2007

4. List of Submitted Studies

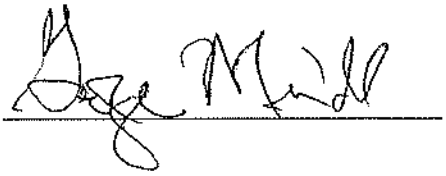
Volume 1
Administrative Documents

PRIA letter
Application for Pesticide Registration (EPA form 8570-1)
Confidential Statement of Formula (EPA form 8570-4)
Data Matrix (EPA form 8570-35) both public and EPA versions

Volume 2
(3 copies of all studies)

47126701 Product Chemistry (Guidelines 830.1550 - 1800), which includes confidential attachment
47126702 Product Chemistry (Guidelines 830.1700)
47126703 pH (Guideline 830.7000)
47126704 Density/Relative Density/Bulk Density (Guideline 830.7300)

Nufarm Inc.
George Meindl
Registration Manager
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527
Phone: 630.455.2017 Fax: 630.455.2030
george.meindl@us.nufarm.com

Company Official: George Meindl Signature: 

Company Name: Nufarm Inc.

Company Contact: George Meindl Phone: 630.455.2017
Registration Manager

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

May 7, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT
OR PAY ON-LINE at www.Pay.Gov (See Below for Details)

OPP Decision Number: D-378900
EPA File Symbol or Registration Number: 71368-61
Product Name: IMIDACLOPRID TECHNICAL
EPA Receipt Date: 03-May-2007
EPA Company Number: 71368
Company Name: NUFARM, INC.

George Meindl
NUFARM, INC.
150 HARVESTER DRIVE SUITE 200
BURR RIDGE, IL 60527

SUBJECT: Receipt of Amendment Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for Amendment. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R34

NON-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL STATEMENTS;SOURCE CHANGES TO AN UNREGISTERED SOURCE);

Please remit payment in the amount of: $ 3,150 to:

By USPS:
USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

By Courier:
U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

Effective November 1, 2006, fees may be paid on-line via credit card or electronic fund transfer. To submit a payment on-line, visit www.pay.gov. From the pay.gov home page, select "search by form name." From the next page, select "P," then click on "Pesticide Registration Improvement Act. Fee Payment" and complete the form, making certain to use the decision number and registration number on the invoice you receive from the Pesticide Program in the space provided.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is soley associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how th request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:
Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

By Courier:
Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900 Potomac Yard
2777 S. Crystal Dr.
Arlington, VA

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman,

at (703) 305-6249.

Sincerely,

Front End Processing Staff
Information Technology & Resources Management Division

Fee for Service {809808G~

This package includes the following

- New Registration
- • Amendment

✓ Studies? Fee Waiver?

volpay % Reduction: ___

for Division

- ○ AD
- ○ BPPD
- • RD

Risk Mgr. 1

Receipt No. S-	809808
EPA File Symbol/Reg. No.	71368-61
Pin-Punch Date:	5/3/2007

☐ This item is NOT subject to FFS action.

Action Code:

Requested:	R34
Granted:	R34
Amount Due:	$ 3,150.00

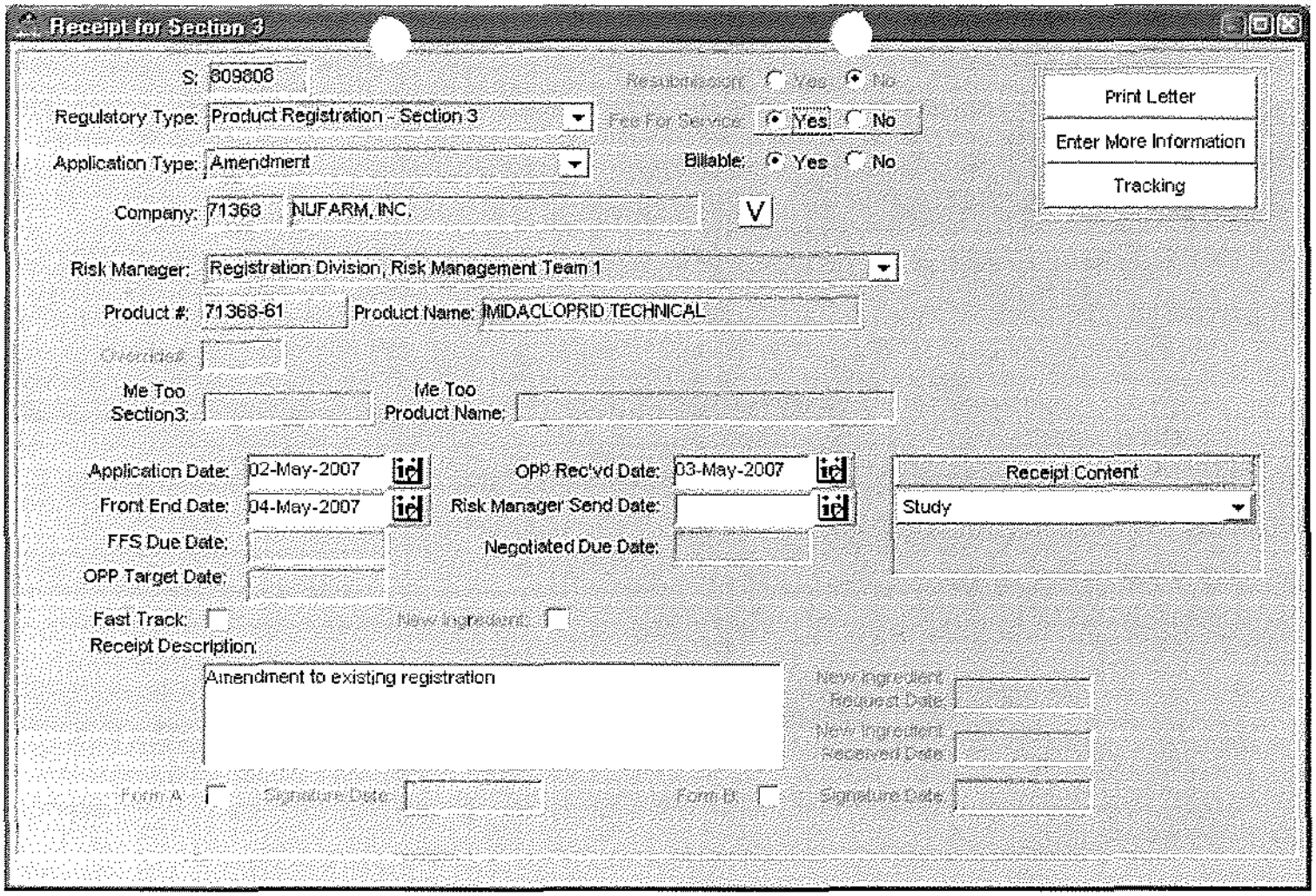
Parent/Child Decisions:

✓ Inert Cleared for Intended Use KBL

Uncleared Inert in Product

Reviewer: J. Miller Date: 5-9-07

Remarks:


Receipt for Section 3
S: 809808
Resubmission: Yes No
Regulatory Type: Product Registration - Section 3
Fee For Service: Yes No
Application Type: Amendment
Billable: Yes No
Company: 71368 NUFARM, INC.
Print Letter
Enter More Information
Tracking
Risk Manager: Registration Division, Risk Management Team 1
Product #: 71368-61
Product Name: IMIDACLOPRID TECHNICAL
Chemical:
Me Too Section3:
Me Too Product Name:
Application Date: 02-May-2007
OPP Rec'vd Date: 03-May-2007
Front End Date: 04-May-2007
Risk Manager Send Date:
FFS Due Date:
Negotiated Due Date:
OPP Target Date:
Receipt Content
Study
Fast Track:
New Ingredient:
Receipt Description:
Amendment to existing registration
New Ingredient Request Date:
New Ingredient Received Date:
Form A:
Signature Date:
Form B:
Signature Date:

FEE FOR SERVICE

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

United States
Environmental Protection Agency
Washington, DC 20460

[ ] Registration
[X] Amendment
[ ] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
71368-61	Venus Eagle	[ ] None [ ] Restricted
4. Company/Product (Name)	**PM#**	
Imidacloprid Technical	1	

5. Name and Address of Applicant *(Include ZIP Code)*

Nufarm Inc.
150 Harvester Drive Suite 200
Burr Ridge, IL 60527

[ ] *Check if this is a new address*

6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

Section - II

[X] Amendment - Explain below.
[ ] Resubmission in response to Agency letter dated _____
[ ] Notification - Explain below.
[ ] Final printed labels in response to Agency letter dated _____
[ ] "Me Too" Application.
[ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

R34 Amendment request/non fast track - this submission includes product chemistry to review
$3150.00
4 month review

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [ ] No	[ ] Yes [ ] No	[ ] Yes [ ] No	[ ] Metal [ ] Plastic [ ] Glass [ ] Paper [ ] Other (Specify) _____
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt. / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[ ] Label [ ] Container		[ ]

6. Manner in Which Label is Affixed to Product: [ ] Lithograph [ ] Paper glued [ ] Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
George Meindl (george.meindl@us.nufarm.com)	Registration Manager	630.455.2017

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature	3. Title	6. Date Application Received
	Registration Manager	(Stamped)
4. Typed Name: George Meindl	5. Date: 5/2/2007	

Nufarm Inc.
George Meindl
Registration Manager
150 Harvester Drive Suite 200
Burr Ridge, IL 60527
Phone: 630.455.2017 Fax: 630.455.2030
george.meindl@us.nufarm.com

May 2, 2007

Via Overnight Courier

Venus Eagle (PM-1)
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Subject: Imidacloprid Technical
EPA Reg. No. 71368-61
Amendment to existing registration
Non- fast track request R34 (89)

Dear Ms. Eagle:

We would like to add another source to the existing subject registration. Under the Pesticide Registration Improvement Act of 2003, it is our opinion that this action falls under category R34 89, amendments/non-fast track. We believe this is the appropriate category since this application request is to amend an existing registration that includes reviewing product chemistry data. Therefore Nufarm anticipates this action requires a fee of $3150 and we would anticipate a four-month review time.

To process this request please find attached the transmittal document listing the administrative material and all submitted studies needed to support this registration request.

If you should have any questions regarding this matter, please feel free to contact me at 630.455.2017 or email at george.meindl@us.nufarm.com.

Sincerely,

George Meindl
Registration Manager
Nufarm Inc.

Nufarm Inc.
George Meindl
Registration Manager
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527
Phone: 630.455.2017 Fax: 630.455.2030
george.meindl@us.nufarm.com

TRANSMITTAL DOCUMENT

1. Name and Address of Submitter

   Nufarm Inc.
   150 Harvester Drive Suite 200
   Burr Ridge, IL 60527

2. Regulatory Action in Support of Which This Package is Submitted

   Application for Pesticide Registration
   Imidacloprid Technical
   EPA Reg. No. 71368-61
   PRIA category R34 89
   Amendment to existing registration/Non-fast track - this submission includes product chemistry to be reviewed

3. Date of this Submission

   May 2, 2007

4. List of Submitted Studies

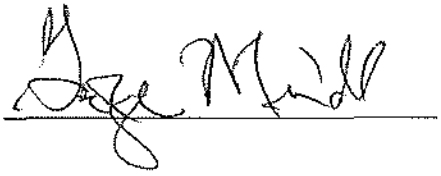
Volume 1
Administrative Documents

PRIA letter
Application for Pesticide Registration (EPA form 8570-1)
Confidential Statement of Formula (EPA form 8570-4)
Data Matrix (EPA form 8570-35) both public and EPA versions

Volume 2
(3 copies of all studies)

Product Chemistry (Guidelines 830.1550 - 1800), which includes confidential attachment
Product Chemistry (Guidelines 830.1700)
pH (Guideline 830.7000)
Density/Relative Density/Bulk Density (Guideline 830.7300)

Nufarm Inc.
George Meindl
Registration Manager
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527
Phone: 630.455.2017 Fax: 630.455.2030
george.meindl@us.nufarm.com

Company Official: George Meindl Signature: 

Company Name: Nufarm Inc.

Company Contact: George Meindl Phone: 630.455.2017
Registration Manager

Form Approved OMB No. 2070-0060

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

DATA MATRIX

Date	EPA Reg No./File Symbol	Page
May 2, 2007	71368-61	1 of 1

Applicant's/Registrant's Name & Address	Product
Nufarm Inc. 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527-0866	Imidacloprid Technical

Ingredients: Imidacloprid

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550-1800	Product Chemistry	submitted	Nufarm Inc.	OWN	
830.1700	Product Chemistry	submitted	Nufarm Inc.	OWN	
830.7000	Product Chemistry	submitted	Nufarm Inc.	OWN	
830.7300	Product Chemistry	submitted	Nufarm Inc.	OWN	

Signature	Name and Title	Date
	George Meindl Registration Manager	5/2/2007

Form Approved OMB No. 2070-0060

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401 M Street, S.W.
WASHINGTON, D.C. 20460

DATA MATRIX

Date	EPA Reg No./File Symbol	Page 1 of 1
May 2, 2007	71368-61	

Applicant's/Registrant's Name & Address
Nufann Inc.
150 Harvester Drive, Suite 200
Burr Ridge, IL 60527-0866

Product
Imidacloprid Technical

Ingredients: imidacloprid

Submitter	Status	Note
Nufarm Inc.	OWN	
"	"	
"	"	
"	"	
"	"	
"	"	
"	"	

Signature

Name and Title George Meindl
Registration Manager

Date 5/2/2007

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Public File Copy

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060

United States
Environmental Protection Agency
Washington, DC 20460

[ ] Registration
[X] Amendment
[ ] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
71368-61	Venus Eagle	[ ] None [ ] Restricted
4. Company/Product (Name)	**PM#**	
Imidacloprid Technical	1	

5. Name and Address of Applicant *(Include ZIP Code)*

Nufarm Inc.
150 Harvester Drive Suite 200
Burr Ridge, IL 60527

[ ] *Check if this is a new address*

6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

Section - II

[X] Amendment - Explain below.
[ ] Resubmission in response to Agency letter dated _____
[ ] Notification - Explain below.
[ ] Final printed labels in response to Agency letter dated _____
[ ] "Me Too" Application.
[ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

R34 Amendment request/non fast track - this submission includes product chemistry to review
$3150.00
4 month review

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes [ ] No	[ ] Yes [ ] No	[ ] Yes [ ] No	[ ] Metal [ ] Plastic [ ] Glass [ ] Paper [ ] Other (Specify)
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[ ] Label [ ] Container		[ ]

6. Manner in Which Label is Affixed to Product: [ ] Lithograph [ ] Paper glued [ ] Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
George Meindl (george.meindl@us.nufarm.com)	Registration Manager	630.455.2017

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title	5. Date
[signature]	Registration Manager	6/4/2007
4. Typed Name: George Meindl		

EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

Nufarm Inc.
George Meindl
Registration Manager
150 Harvester Drive Suite 200
Burr Ridge, IL 60527
Phone: 630.455.2017 Fax: 630.455.2030
george.meindl@us.nufarm.com

June 4, 2007

Via Overnight Courier

Venus Eagle (PM-1)
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

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Sincerely,

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   Burr Ridge, IL 60527

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   Imidacloprid Technical
   EPA Reg. No. 71368-61
   PRIA category R34 89
   Amendment to existing registration/Non-fast track - this submission includes product chemistry to be reviewed

3. Date of this Submission

   June 4, 2007

4. List of Submitted Studies

Volume 1
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Confidential Statement of Formula (EPA form 8570-4)

Volume 2
(3 copies of all studies)

Product Chemistry (Guidelines 830.1550 - 1800), which includes confidential attachment
Product Chemistry (Guidelines 830.1700)

Company Official: George Meindl Signature:

Company Name: Nufarm Inc.

Company Contact: George Meindl Phone: 630.455.2017
Registration Manager

Pages 136-147-*Confidential Statement of Formula may be entitled to confidential treatment*